

THE CONSUMER COUNCIL

Consumer Consultative Machinery in the Nationalised Industries

A Consumer Council Study

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Preface

Since going to press, certain developments have taken place which lend added point of a more topical nature to some of the suggestions put forward in the course of our study. In particular, the forthcoming increases in the price of electricity and those now being mooted in the price of gas carry a challenge to the national efficacy of the consultative councils in the two industries in looking after the interests of their consumers. Several of the electricity consultative councils, it is true, have taken up individual stands in protest against the increases locally and it is understood that the electricity council chairmen have met to concert an approach to the Minister of Power regarding certain aspects of the matter. Even so, it remains abundantly clear that in neither industry is the consultative machinery adequately geared to deal with issues such as these, which are nationwide in their impact and have a consumer interest that is undeniable. And the fact that it is now planned to refer all proposed increases in charges to the National Board for Prices and Incomes in the future, apparently without reference to, or call upon, the consumer consultative bodies, would seem to

lend added, if tacit, support to this view. It is, in our view, the lack in either industry of any effective central rallying-point for the consumer interest that is largely responsible for this weakness. Moreover, this lack may be brought even more into evidence when the new financial obligations to be imposed on the industries for the next five years are eventually announced. Whether or not our own suggestions for strengthening the machinery at top level provide the best solution, they would, we contend, equip it to play a more active part nationally on the consumers' behalf than it is able to do at the present time.

Even more striking is the fact that transport users have no redress through their consultative committees against the increased fares now being sought by the British Railways and London Transport Boards. These committees are specifically debarred from even considering and making representations about such increases. Here also—subject to present uncertainty as to future transport policy—we have certain suggestions to offer.

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Chapter One

The Purpose and Scope of the Study

Introduction

In undertaking the present study, which covers the consumer consultative machinery in the four nationalised industries of electricity, gas, solid fuel and public transport, the Consumer Council has been moved by two considerations. One of them is the growing indispensability to consumers generally of adequate supplies of fuels of their choice and of adequate facilities for transport; the other is the fact that the consultative machinery in these industries, having been set up by statute at the time of nationalisation, has now been in operation for some twenty years, so that a study of it in the light of present day, and possible future, conditions seems likely to fulfil a contemporary need.

The growing indispensability to consumers of fuel supplies and transport provision in this modern age needs little elaboration. Improvements in heating arrangements and an increasing utilisation of powered equipment are now so much bound up with what domestic consumers associate with better living conditions that any failure of fuel supplies to keep pace with rising demand can rapidly produce crisis and hardship. Even more critical in their consequences, if they cannot be met, are the industrial consumers' own expanding calls on available fuel supplies, since these represent a vital element in the very continuance of the country's economic advance. And similarly in the case of transport. Rising standards of living create their own demands for more and better facilities for the transport of individuals, while industrial advance does the same even more exigently in regard to the transport of resources. For individuals and for the nation, therefore, fuel products and transport facilities have come to assume the status of necessities, or at least near necessities, in the hierarchy of modern consumer priorities. As a result, the demand for them overall (disregarding the possibilities of substitution as between particular fuels and as between particular forms of transport) tends to become less and less responsive to the terms on which they are being supplied, thus leaving the consumers that much more vulnerable to such pressures as can be exerted by suppliers in a position to exercise monopolistic powers, regardless of whether the latter are state-owned suppliers or suppliers operating in the private sector.

It was a recognition of this fact, at the time when major fuel and transport industries were being

nationalised just after the end of the war, that led to the setting up of the consumer consultative organisations in these industries in the first place. The need, as then conceived, was to provide the consumer interests concerned with statutory machinery that would help them to lessen their vulnerability in face of the monopolistic powers of the new nationalised public corporations and give them a voice that could at least be heard at decision-making levels. To this end, a whole variety of consumer organisations of one sort or another was established under the relevant nationalisation acts. The consumer organisations in the electricity industry were provided for under Section 7 of the Electricity Act of 1947, the provisions being later modified under Section 5 of the Electricity Act of 1957; those in the gas industry, under Section 9 of the Gas Act of 1948; those in the coal industry, under Section 4 of the Coal Industry Nationalisation Act of 1946; and those in the transport industry, under Section 6 of the Transport Act of 1947, later replaced by those under Section 56 of the Transport Act of 1962. (Reproductions of the relevant sections of these acts are to be found in full in Appendix I). Necessarily, these arrangements do not cover the consumers of fuels (e.g. fuel oils) and transport facilities that are supplied from outside the nationalised industries, though, to the extent that monopolistic positions obtain among private sector suppliers, the vulnerability of such consumers is, of course, just as real.

Now that twenty years of life lie behind these consumer organisations, and having regard to the circumstance that they serve the consumers of industries whose products and services are becoming increasingly essential to modern life, it therefore seems to us that a study of them on the present lines is not only timely but falls properly within the Consumer Council's overall concern for the ways in which the consumer interest in all fields is being safeguarded and upheld. Added point to the study is also provided by the fact that, unlike those set up prior to 1945, the present consumer organisations are essentially 'consultative' in character, so that they are able to advise as well as to criticise, to be consulted from 'above' as well as to make representations from 'below'. Though their organisational features conform to no uniform pattern, the fact that they are designed for this two-way, and more constructive, role marks an entirely new develop-

ment in the exercise of consumer influence. Not only does it make of them a subject of special interest for study but also, in effect, a first and major experiment that may well carry implications of importance for similar or related developments in other sectors of the consumer front.

Objects and Approach

The principal objects we have had in mind in carrying out this study can be summarised as follows:

- (a) to discover how much consumers know about the consultative machinery in each of the four industries under review, how much they are using it and what is their opinion regarding its efficacy;
- (b) to discover how the machinery itself is actually working and how it is being used to look after, and to seek to further, the interests of the consumers of the products and services of these industries;
- (c) to isolate, if possible, any areas of weakness or deficiency which seem to indicate that the machinery is less effective in the consumers' interest than it might be, more especially as seen in the context of changes that have taken place over the past twenty years or of likely changes in prospect; and
- (d) to advance such suggestions as seem to us to be appropriate and likely to improve the machinery and its working to the benefit of the consumers concerned, as well as to that of the industries themselves, and to draw any conclusions which seem to be relevant to a wider context.

Our approach to the study has taken two forms—from the angle of the consumers themselves and from that of the consultative machinery and its context of operation. For the former approach, a field survey was carried out for us by Social Surveys (Gallup Poll) Limited to find out from a country-wide sample of individual consumers what they knew about the consultative machinery in the four industries and what, if any, had been their experiences in using it. For the second approach, discussions were held over a period of many months with those responsible for operating the machinery and with those having working relations with it; questionnaires were sent out for completion; and relevant literature (e.g. annual reports, etc.) was studied.

It was the latter approach which constituted the major part of the enquiry and has provided the material for all except one of the subsequent chapters. Of the four categories of consultative organisations with which we were concerned, the two that were most exhaustively examined were the electricity and the gas consultative councils. Partly, this was because, having no central organisation, the

councils in both of these industries were geographically dispersed and therefore needed to be investigated separately; partly, it was because they seemed to be less unknown to the general public than the other organisations. In the course of this part of the study, the headquarters of all of the gas consultative councils and of all but one of the electricity consultative councils were visited and several meetings of councils attended. Discussions were held with all but one of the gas council chairmen and with all but one of the electricity council chairmen; and with all of the secretaries of both groups of councils. In addition, a questionnaire was sent to each of the councils and resulted in some detailed replies. Discussions were also held with the chairman and a member of the Electricity Council and with a senior officer of the Gas Council; and with officials at the Ministry of Power and at the Office of the Secretary of State for Scotland. In the case of the Domestic Coal Consumers' Council, we held discussions with the chairman and the secretary of the Council and with a member of the Coal Board; with the secretary of the National Panel of the Approved Coal Merchants Scheme and with several of the Scheme's regional panel secretaries; and at the Ministry of Power. Our study of the transport consultative machinery included discussions with the chairman and secretary of the Central Transport Consultative Committee (and also attendance at a meeting of that Committee); with the secretaries of two of the local transport users consultative committees; with a member of the British Railways Board and several of the Board's senior officers; and with officials at the Ministry of Transport. A questionnaire was also completed by each of the local transport users committees and a summary of their replies provided by the Central Committee.

At this point, it would be appropriate to record how very helpful and co-operative were all whom we approached and with whom we held discussions in connection with this study, in particular the chairmen and secretaries of the various consultative councils and committees. The keen interest they evinced in the study, their readiness to make available, often at considerable trouble to themselves, the information we sought, as well as to give us the benefit of viewpoints based on their own experience of working the machinery, all contributed greatly towards making our task much less difficult than it might otherwise have been and also, we venture to hope, more rewarding in its final form.

Plan of the Study

We begin the substance of the study with a summary of the main findings of the field survey

carried out in connection with the consumers' knowledge and experience of the consultative machinery and this provides the content of chapter two. The detailed statistical findings of the survey are set out separately in tabular form in Appendix V. Chapter three—a long chapter, broken down into eight main sections—is devoted to the electricity and gas consultative councils. The two groups of councils have been treated together, since in organisation and functioning they are very much alike. Much that may be said about the electricity consultative councils applies equally to the gas consultative councils, and conversely; and, where points of difference do arise, they tend to stand out the better by comparison. The Domestic Coal Consumers' Council (including the Approved Coal Merchants Scheme) is the subject of chapter four; and the transport consultative committees of chapter five. In chapter six, we attempt to gather together the more basic threads of the subject-matter and to focus attention on the principles underlying the machinery, taking account at the same time of the constantly changing environ-

ment in which it has to work and advancing suggestions of a general nature as to how we judge that it may need to develop if it is to measure up to its full potential and be equipped to meet new challenges in the future. Finally, the conclusions we have arrived at and the suggestions put forward in the course of the study are brought together in a classified and abbreviated form and summarised in chapter seven.

The appendices, in addition to reproductions of the main enactments governing the setting up and operation of the consultative bodies and of the statistical findings of the field survey, include also lists of the names, telephone numbers and addresses of the consultative bodies in the four industries, together with the names of their chairmen and/or secretaries (Appendix II); summaries of complaints received by an electricity consultative council and by a transport users consultative committee (Appendix III); and a plan of the publicity arrangements of a gas consultative council (Appendix IV).

Chapter Two

Field Survey of Public Knowledge and Experience of Consultative Organisations

An essential part of the present study has been to take a look at the consultative machinery through the eyes of those whom it exists to serve—the consuming public. How widely known about by the public are the consultative organisations in the four industries we are studying? And what has been the experience of those who have had occasion to use them? It was to find answers to these questions that the Consumer Council commissioned Social Surveys (Gallup Poll) Limited to undertake a field survey.

In this chapter, we are setting out a summary of the main findings of the survey, giving at the same time the tabular references in Appendix V of the relevant statistical data upon which these findings have been based.

Nature of the Survey

The survey was carried out in two parts. In the first part, countrywide interviews were held early in 1966 with a sample of 4,728 men and women, aged 16 and over, to find out:

- (a) whether they knew of the existence of consultative organisations in the electricity, gas, solid fuel and transport industries;
- (b) the sources from which their knowledge came;
- (c) what complaints they had had about the services of these industries over the past twelve months;
- (d) what were their most recent complaints;
- (e) to whom any complaints had been made; and
- (f) their reasons (if any) for not having complained (where applicable).

The sample was broken down regionally on a population percentage basis and 240 sampling points were covered. Interviewers were given quotas for the sex, age, socio-economic class and occupation of their respondents; and, at the tabulating stage, the sample was weighted where necessary to give the correct proportion (based on population statistics) by sex within each region. Thus, the weighted total in the sample became 5001. A profile of the sample by sex, age, class and region is given in Table 1, together with a profile of those in the sample—who numbered only 15—who had actually used one of the consultative organisations.

The second part of the survey—which was a distinct operation—was carried out later in the year. The first stage of this part of the survey was based on a question put to 15,000 households over a period of three months as to whether any member of the

household had approached any of the consultative organisations about problems connected with the electricity, gas, solid fuel or transport industries over the past twelve months. The total of those who claimed that they had was only 313 (one person only per household being counted). As only 10 of this number had approached a transport users consultative committee, the experience of this small sample was not included in the second stage of this part of the survey, the findings of which, therefore, relate only to experience of consultative organisations in the electricity, gas and solid fuel industries. During this second stage, personal calls were made by interviewers on 184 of the 303 persons remaining in the sample and a postal questionnaire was sent to the other 119 (with a reminder after seven days in the event of the first questionnaire not being returned). It became apparent, however, at this stage, that there was a great deal of confusion in people's minds as between the electricity and gas consultative councils, on the one hand, and the electricity and gas board showrooms, on the other; and it eventually transpired that a total of 153 in the list had in fact taken their complaints (or queries) to the local showroom and not to a consultative council. This further element had, therefore, to be excluded from the sample. Of the 150 remaining, 5 had been to a consultative body for information only, 17 were on holiday or ill or had moved house or refused to co-operate, and 60 did not return their questionnaires. This left, therefore, a final sample of only 68, from which the findings of this part of the survey had to be drawn. The breakdown of the sample in to details of age, class, size of household, occupation of head of household and whether or not there was a telephone in the house is shown in Table 27.

First Part of the Survey

Knowledge of Consultative Organisations

The dominant fact to emerge from the first part of the survey was that very few people knew even of the existence of the consultative organisations in these four nationalised industries. In fact, only six out of ten of those questioned were able to name any such organisation which could help them with complaints about goods and services provided by these industries. Of the sample of 5001, 12 per cent (without prompting) claimed to have heard of the electricity consultative councils, 12 per cent of the gas consultative

councils, 8 per cent of the Approved Coal Merchants Scheme and only 4 per cent of the transport users consultative committees. With prompting, the proportions were about twice as large for the electricity and gas councils and nearly three times as large for the coal scheme and the transport committees. The latter figures, however, probably contained an element of exaggeration, since no doubt some of those questioned preferred to qualify truth rather than admit to ignorance.

The results of breakdowns by sex, age and class (Table 2) followed a pattern that was fairly predictable. About twice as many men had heard of these organisations—in the case of transport, three times as many—as women. The 33-44 age group was more knowledgeable than either younger or older age groups; and, under class, the higher the category the greater was the degree of awareness. For each of the breakdowns, the pattern as between the four different industries remained much the same.

A geographical breakdown (based on registrar general areas) presented a diversified, and far less predictable, picture (Table 3). So, too, did breakdowns for the electricity and gas consultative councils based on board areas (Table 4). The South Western Electricity Consultative Council (being known to 22 per cent of those questioned) and the Southern Gas Consultative Council (to 20 per cent) were the best known of the councils in the two industries on this basis and the South Eastern Electricity Consultative Council (to only 5 per cent) the least known. It would be misleading, however, to read too much into this geographical distribution of awareness, since so many factors will have entered into the picture which have no bearing whatever on the relative effectiveness of the different local organisations.

Sources of Knowledge

In answer to a question put to those who had heard of the electricity consultative councils as to how they had first come to do so, nearly half said that they had read about them, nearly one in five said that they had learned of them from the board showrooms and one in ten that they did not know. A very similar response to the same question came from those who had heard of the gas consultative councils. In the case of the transport users committees, only 8 per cent attributed their knowledge of the committees to railway stations, while as many as one in six said that they did not know how they had come to hear of the committees. Friends or relatives seemed to have been the source of information for about one in ten in the case of each industry. (Tables 5, 6 and 7).

A breakdown of the sample by sex, age and class revealed very little more about the sources from which knowledge of the organisations had come, departures from the figures given for the whole sample being only minimal. Rather more men than women had learned of the electricity and gas councils from electricity and gas showrooms and also of the transport committees from railway stations. For the rest, the differences brought out by the breakdown appear to follow no pattern. The same lack of pattern was evident when the sample was broken down geographically although here the differences as between areas were on a much larger scale. Whereas 34 per cent of those in the London Electricity Board area who had heard of their consultative council had done so from the Board's showrooms as against 38 per cent who had read about it, in the South Western Electricity Board area the respective percentages were 6 and 58. In the North Thames Gas Board area, 26 per cent had learned of the local gas consultative council from the Board's showrooms and 39 per cent had read about it; in the Northern Gas Board area the figures were respectively, 9 per cent and 55 per cent. Railway stations were the source of information about the transport users consultative committees for 13 per cent of those who had heard of them in the North West (registrar general) area, but for none in the East Anglia or Wales areas.

Complaints about Electricity

All of the 5001 people in the sample, being users of electricity, were questioned as to whether they had had any complaints either about the electricity supply or about any electrical appliances bought from their board showroom or servicing provided during the previous twelve months. 19 per cent of them said that they had. Proportionately more of these came from the 35-44 age group and from the upper class group; and proportionately more from the London, South Eastern, Eastern and Midlands Board areas than from other areas. (Tables 8(a) and (b)).

Some three-quarters of all those with complaints had complained about supply and about a quarter of them about appliances and servicing. Under supply, 55 per cent had complained of power cuts and 15 per cent of overcharging; under appliances and servicing, 9 per cent had complained of faulty appliances and 8 per cent of had servicing and servicing delays. 12 per cent of the respondents could not remember what their complaints had been! The 25-34 age group had proportionately the largest number of complaints about appliances and the upper middle and middle class group the largest

number about supply. Geographically, the Southern Board area and the two Scottish Board areas had most supply complainants and the South Western and London Board areas most appliance complainants (Tables 9(a) and (b)).

The proportion of those with complaints who took some action about them was, however, relatively small—only 35 per cent. Most of them—about 30 per cent—took their complaints direct to board showrooms, a small proportion went to the manufacturers and rather less than 1 per cent to consultative councils. (Tables 10(a) and (b)). Even among those few who had it seemed gone to consultative councils, it was later discovered that some had confused the councils with the offices of the local boards. Of the 65 per cent who had not taken any action, 29 per cent said that their reason for not doing so was that it was 'too much bother', 18 per cent that they could not remember their reason, 3 per cent that they did not know where to complain and 7 per cent that it 'was not important'. (Tables 11(a) and (b)). An analysis of the most recent complaints of respondents in terms of where the complaints had been made and of the reasons for not complaining is provided in Table 12.

Complaints about Gas

In the case of gas, only 17 per cent of the total of 3,303 gas users in the sample said that they had had cause for complaint during the previous twelve months. The 35-44 age group and the above average class group—as for electricity—had the most complainants, as did the West Midlands and the North Thames Gas Board areas (in the case of the former, no doubt due to power cuts during the winter of 1965-66). (Tables 13(a) and (b)).

Supply problems accounted for 70 per cent of the complaints—45 per cent of these being about gas pressure, 11 per cent about overcharging and 9 per cent about leaky pipes. 38 per cent of the complaints were about appliances and servicing (some of the complainants had more than one complaint), 19 per cent of these arising from faulty appliances, 5 per cent from faulty installations and 14 per cent from bad servicing and servicing delays. The over 65 age group and the lower middle and wage-earning class group had most complaints about supply and the 25-34 age group and the upper middle and middle class group most about appliances and servicing. The South Western Gas Board area had the largest proportion of supply complainants and the Eastern Board area the largest proportion of appliance and servicing complainants. Breakdowns of these complaints by sex, age, class and gas board areas are set out in Tables 14(a) and (b)).

Of those with complaints, 56 per cent had taken some action about them—proportionately more, in fact, than in the case of electricity. 51 per cent of these complainants had gone to gas board showrooms, 2 per cent to manufacturers and only 1 per cent to consultative councils (some of these latter being confused with board offices). 'Too much bother' (19 per cent) and 'was not important' (8 per cent) were the principal reasons given for not taking action on complaints. (Tables 15(a) and (b), Tables 16(a) and (b) and Table 17)).

Complaints about Solid Fuel

23 per cent of the 3,748 users of solid fuel in the sample said that they had had cause for complaint during the previous twelve months. Bad quality fuel accounted for 55 per cent of the complaints and failure to deliver on time for 27 per cent. The 25-34 age group and the upper class groups had rather more complainants than the others, as did the Northern, Scotland and West Midlands (registrar-general) areas with 28 per cent each. (Tables 18 (a) and (b) and Tables 19 (a) and (b)).

Action had been taken by 64 per cent of those with complaints, 60 per cent going to the local coal merchants. Of the 36 per cent who had not complained, 16 per cent said that it had been 'too much bother' and 10 per cent that they could not remember their reasons for not doing so. (Tables 20(a) and (b) and Tables 21(a) and (b)).

Complaints about Public Transport

Out of the 3,662 users of public transport questioned, 37 per cent claimed to have had some ground for complaint over the preceding twelve months. The upper class group had more complainants than the other groups. Complaints in the South East (registrar-general) area (at 50 per cent) were way ahead of those in any other region; those in the North West area (at 34 per cent) were slightly below the national figure. 'Fares too high' (39 per cent), 'infrequent service' (38 per cent) and 'erratic timetable' (37 per cent) were the main causes of complaint. (Tables 22(a) and (b) and Tables 23(a) and (b)).

Only 23 per cent of those with complaints, however, had done something about them. 12 per cent had taken their complaints to the bus companies' central or local offices and 5 per cent to the British Railways head office or local stations. Less than 1 per cent had gone to a local transport users consultative committee. Of the 77 per cent who had not complained, 53 per cent said that it was 'too much bother'. (Tables 24(a) and (b) and Tables 25(a) and (b)).

The summary of the main findings of this first part of the survey in regard to the main questions posed is set out in Table 26.

Second Part of the Survey

As was explained earlier in the chapter, the investigations carried out in the second part of the survey to discover what had been the experiences of those who had actually used one or another of the consultative bodies in the four industries under review had narrowed down in the event from an original 15,000 households to a total sample of only 68—a total from which users of transport users consultative committees had had to be excluded as they were so few in number.

This was a disappointingly small sample and, even though its spread was countrywide, any findings based upon it must necessarily be accepted with considerable reservation. Nevertheless, when the questioning of the small sample of users had been completed, the results showed, in general, a very positive verdict which made them well worth inclusion in the study.

Reasons for approaching the Consultative Bodies

Of the sample of 68, 34 had approached a gas consultative council, 20 an electricity consultative council, 10 the Approved Coal Merchants Scheme and 5 the Domestic Coal Consumers' Council. (As one member of the sample had had dealings with both gas and electricity consultative councils, he was counted twice, making the sample effectively 69). 53 of those in the sample had approached a consultative body in connection with complaints (several of them with more than one complaint), the remaining 16 having gone for information only. Table 28 sets out a breakdown for the four industries into the various causes of complaint. Faulty installations and faulty appliances provided the majority of causes of complaint, especially to the gas consultative councils, with overcharging, mainly for electricity, running close. Delays in servicing, bad servicing and power cuts were other but minor causes of complaint. Complaints about solid fuel were few and were directed almost equally to the Approved Coal Merchants Scheme and the Domestic Coal Consumers' Council.

Those who went to see one or another of the consultative bodies only for information did so for a variety of reasons. Gas enquiries were made by 8 of the 16 and were mainly about central heating installation and the type of gas appliance to be used. Electricity enquiries were few and about storage heaters and the choice of a central heating system. Central heating problems also predominated in the

enquiries directed at the two solid fuel consultative bodies.

Showrooms (for 19 out of 69) and friends and relatives (for 17 out of 69) had been the principal sources of information about the consultative bodies for those who had actually used them (Table 29). This was quite different from the case of those who had only heard of the bodies but had not used them and for whom, as we saw earlier, reading about them had been the principal source of information.

Action taken by Complainants

Table 30 sets out the first steps taken by the 53 complainants in the sample to get their complaints attended to. 16 of the gas complainants got into touch with their local gas board showrooms, while 7 went straight to their gas consultative councils. In the case of electricity complainants, the corresponding figures were 14 and 4, respectively. Solid fuel complainants nearly all went direct either to the Approved Coal Merchants Scheme or to the Domestic Coal Consumers' Council. The majority of complainants in each of the three industries made their first approach either by calling in person or by telephoning.

Questioned about the time factor, 29 out of the 53 with complaints said that less than a week had elapsed before they had taken their first step, 11 that between one and four weeks had elapsed and a further 11 that over four weeks had elapsed. In the case of those (i.e. 35) who did not in the first place approach a consultative body, 9 said that they had done so within a week and 10 within one to four weeks. These figures are set out in detail in Tables 31 and 32.

Action taken by Consultative Bodies

Gas consultative councils referred 19 out of the 26 complainants who had come to them to the gas board showrooms, while the electricity councils referred 8 out of their 18 complainants to the electricity board showrooms. Action taken by the electricity councils on the remaining 10 complaints included contacting appropriate officials of electricity boards, calling in person and investigating the complaint and arranging for someone to come along and attend to the matter. Action taken by gas councils included 'trying to put the leak right', contacting a fitter, inspecting the installation and 'filling in a form'. In the case of the 5 complaints referred to the Approved Coal Merchants Scheme, action taken included making arrangements for improving the supply and quality of the coal delivered, promising to look into the matter (in one case after a delay of 6 weeks) and giving advice not to deal with a particular merchant. Some incom-

clusive advice was, according to one complainant, the outcome of his approach to the Domestic Coal Consumers' Council; a recommendation to try another grade of fuel was the answer given to another.

The time taken by the different consultative bodies to settle complaints naturally varied according to circumstances. The majority of the complaints referred to these bodies weresettled within a week and about a half of the remainder within four weeks (Table 33).

Satisfaction with Action taken by Consultative Bodies

By far the greater proportion of those who had been to one or another of the consultative bodies with their complaints expressed themselves as satisfied with the outcome—41 in fact out of a total of 53 complainants. Of these, gas complainants accounted for 22 (out of 26), electricity complainants for 12 (out of 18) and solid fuel complainants for 7 (out of 9). This, despite the smallness of the sample, gives a definite judgment in favour of the bodies concerned (Table 34).

Among the many different reasons advanced for their satisfaction, gas complainants instanced the fact that prompt action had been taken on their behalf; that the appliance had been put right immediately; that the servicing had been good; that a case of over-charging had been looked into and quickly put right; and that the matter had been taken up with the gas board showroom and that quick service had followed. Electricity complainants were satisfied because, among other reasons, someone had come straight away to check the complaint; faulty lights had since been made to work; an overpayment of an account had been put right by a refund; a satisfactory letter of explanation had been sent; and the council had 'got action'. One of the solid fuel users who had gone to the Approved Coal Merchants Scheme with a complaint thought that there had been an improvement since a previous approach.

Those who had been dissatisfied with the handling of their complaints were not, however, able to give very convincing reasons for their dissatisfaction. The two reasons that were sufficiently specific to have possible substance were, in the one case, because the complainant had been 'passed on to so many people' and, in the other, 'because of delay experienced'.

Asked whether, in the event of having a further complaint, they would go again to a consultative body, 62 out of the 69 in the sample said that they would (Table 35). Of the few who would not, one said that he thought the gas board could handle everything; another that it was a 'complete waste of time'; and another that 'a good old fashioned coal merchant knows best'.

The Value of Consultative Bodies

Experience in using one of the consultative bodies led 34 out of the 69 questioned to the view that the bodies were very good for the handling of individual complaints and 'could not be better', 21 thought that they were 'fairly good but might be improved' and 3 that they were 'no good at all' (Table 36). 58 in the sample had found the bodies helpful, 41 efficient and 41 knowledgeable. Only 6 had found them not very helpful, 6 thought them to be inefficient and 4 uninformed (Table 37).

When asked what improvements, if any, in the consultative machinery their experience had prompted them to suggest, 55 said that no improvements were needed (Table 38). From the 7 who thought that gas consultative councils could be improved, the principal suggestions to emerge were that the councils should take more steps to make themselves better known and that they should aim to 'get things done more quickly'. More publicity was also suggested for the electricity consultative councils, as well as that the councils should be prepared to take up complaints earlier. The coal scheme, too, was too little known about and needed to 'wake up' and to work more quickly.

General Observations on the Survey

In the light of these findings, two separate and distinct conclusions seem to follow. From the first part of the survey, it becomes clear that only a relatively marginal impact has as yet been made by the consultative organisations in the four industries on the awareness of the consuming public in general; while, from the second part and despite the smallness of the eventual sample, the verdict on the usefulness of these organisations by those consumers who have had some recourse to the facilities provided is a decidedly favourable one.

While, on the face of it, these two broad conclusions, considered together, seem to point to some defect of projection or communication which is preventing the consultative organisations from reaching their full potential of consumer service, it must be remembered that a survey such as this is subject to certain limitations of scope which must necessarily qualify any inferences drawn from its findings.

In the first place, the coverage of the survey was on a limited scale and, as already emphasised, the effective sample in its second part was disproportionately small. More specifically, the survey was confined in its questioning to *individuals* only, not all of whom were consumers of all four of the industries being examined. While this basis of enquiry served the purpose of the survey, it is not of itself alone a

basis on which to arrive at any balanced judgment as to the real efficacy of the consultative bodies in serving the consuming public. It excludes from consideration the experiences of local authorities and other bodies which frequently make representations to the consultative organisations on the consumer's behalf; and it can take no account of the

large amount of work done by consultative organisations in helping to influence policy developments in their respective industries along lines which will be of benefit to consumers. Nevertheless, it serves to provide a viewpoint to be considered alongside other and differently based viewpoints to be followed up in subsequent chapters.

Chapter Three

The Electricity and Gas Consultative Councils

Four Introductory Observations

Before embarking on the study of the electricity and gas consultative councils in detail, there are four introductory observations of a general nature which it seems desirable to make at this stage, both as background to subsequent discussion and also to assist in keeping the picture as a whole in perspective. These concern our own overall impression regarding the efficacy and value of the councils; the existence of marked local diversities in their characters and methods of working; the part played by historical influences; and the importance of the human factor, and its development over the years, in the working of the councils.

Despite the relatively small impact which the consultative councils in the two industries seem as yet to have made on the general public, we have arrived at the general conclusion that, by and large, they are doing a good and valuable job in their localities. There was, we found, almost everywhere evidence of a genuine and devoted—and, in certain cases, dedicated—commitment to their council's work on the consumers' behalf by council chairmen and secretaries; and, from the more detailed discussions held, evidence, too, of a great deal of really useful work that was being done and being done well. It is true that, eleven years ago, the Committee of Enquiry into the Electricity Supply Industry (the Herbert Committee) reported in a similar vein about the electricity consultative councils at that time, the Committee being then 'satisfied that in a quite modest way the (electricity) consultative councils have done and are doing creditable work in safeguarding the consumers' interests'. Although comparisons over time are difficult and apt to be unreliable, we believe that, overall, the councils have been gradually, if slowly, developing their consultative role to the consumers' advantage during the intervening years. Now, however, with radical new developments in fuel supply and equipment taking shape, new challenges are confronting the councils and call for a look at their work and scope in rather broader terms than was needed a decade ago.

What became specially noticable during our investigations was the marked diversities of character and working as between individual councils, over and above their necessary conformity to statutory requirements. In fact, these were often more marked between councils in the same industry, if widely

separated geographically, than between those in the different industries. Diversities of terrain and population content, reflecting the geographical spread of the councils, naturally posed corresponding diversities of problems to be tackled and ways of tackling them; while, in the characters, backgrounds and features of service of council chairmen and secretaries and in their patterns of relationship with the area boards, diversity was also conspicuous. Inevitably, all this makes ready generalisation difficult and often misleading. Yet it is—and rightly—of the essence of the machinery in its actual operation; it takes account not only of diversities among the consumers themselves but also of the essential individuality of local circumstances.

The third general observation concerns the part played by historical influences in shaping the organisation and development of the councils. At the time of nationalisation, both the electricity and the gas industries, more particularly the latter, were in the hands of a relatively large number of distinct undertakings, some municipally owned and run and some privately owned and run. Not unsaturally, from this starting point and in spite of some amalgamation into larger units since, the two industries are still markedly decentralised in structure. As a result, the consultative councils grew up within a context of well-defined local continuity and imbued with a jealously guarded tradition of autonomy. Indeed, it is no doubt largely due to this that the consultative machinery in the two industries now displays across the country the very diversities which we have just mentioned. Despite the centralising pulls of modern technological advance, which are beginning to build up in both industries, we feel that the historical autonomy of the individual councils is still an important asset and one that, in the consumers' interest, needs to be safeguarded against premature or ill-considered dilution.

The fourth of our observations relates to the fact that, over the years, a structure of human relationships in the working of the consultative machinery has been built up, without which it could never have been more than a 'dead letter'. For, in the case of organisational machinery framed to deal with human problems, the accumulated experience of its operators and the goodwill they have succeeded in winning for its work and objects represent assets, as incalculable as they are intangible, that it is of first

importance to weigh well in the balance whenever any changes of substance in the machinery itself come up for consideration. The aim must be to try to conserve these vital, but far from easily replaceable, assets, yet at the same time to harness them to whatever changes in the machinery are seen to be necessary or desirable. This seems to us to be especially relevant in the case of the consultative machinery we are considering here.

The National Structure

There are fourteen electricity and twelve gas consultative councils in Great Britain, all of them statutory bodies established under the relevant Electricity and Gas Acts (Appendix I). They are also all local bodies, based on, and having the same boundaries as, the fourteen electricity and twelve gas area boards in the two industries. Moreover, their immediate reference is to their area boards; their chairmen sit as part-time *ex-officio* members of the boards and by far the greater bulk of their work is with, and through, the boards. They are, however, formally independent of the boards, exercising their functions by enactment and being responsible to the Minister of Power (or, in the case of the two Scottish electricity councils, to the Secretary of State for Scotland), by whom their members are appointed. They have no central consultative body at a national level, in either industry, to which they owe allegiance and no formal links with one another. Right of reference above area board level is, for the twelve electricity councils in England and Wales, first to the Electricity Council and finally to the Minister of Power; for the two Scottish electricity councils, direct to the Secretary of State for Scotland; and, for the twelve gas councils (including the Scottish Gas Consultative Council), direct to the Minister of Power. Thus, it is only at the ministerial level that the councils have any common right of reference supported by formal provision—though, in this respect, the two Scottish electricity councils are differently placed from the other twenty-four.

The high degree of decentralisation which characterises the consultative machinery in these two industries largely reflects, as we have just indicated, that of the industries themselves. For the area boards in these industries are virtually autonomous. Neither the Electricity Council nor the Gas Council has authority to do more than *advise* its area boards, only the Minister (or the Secretary of State for Scotland for the two Scottish electricity boards) being empowered to give *directions* (though, prior to 1957, the then Central Electricity Authority was in a position to do so). At the same time, the gas boards and the Scottish electricity boards have a

wider range of functions than the twelve electricity boards in England and Wales. This is because they are responsible not only for the distribution and retailing of their fuel but also for its production and transmission; whereas the electricity boards in England and Wales are responsible only for distribution and retailing, the production and transmission of electricity in bulk over this area being a matter for the Central Electricity Generating Board. These differences in the scope of area board activity naturally have their effect on the scope of corresponding consultative councils. Whereas the gas councils and the Scottish electricity councils need to range from production to final retailing in their dealings with their area boards, the electricity councils in England and Wales are limited in this respect to distribution and retailing. On the other hand, the latter are empowered to have direct dealings with the Central Electricity Generating Board over matters of production and transmission, even though this does not appear very frequently to occur.

Despite the fact that the consultative councils are local bodies, the areas they serve are very large and varied in character. For this reason, they were required under the acts to submit for ministerial approval 'schemes' for the appointment by themselves of committees or individuals to be their representatives in specified localities. As a result, all of the councils are now backed up in their areas by a number of such committees, variously called 'district' or 'local' committees and in a few instances 'divisional', 'area' or 'regional' committees. The numbers of such committees range from four to nine in the case of the electricity councils and from four to eleven in the case of the gas councils. In all, these are nearly 150 committees in the two industries.

While the councils are subject to certain regulations made under the acts in regard to such matters as terms of membership, the appointment of deputy chairmen and some of their proceedings, they have, subject to these statutory regulations, the power to regulate their own procedure. In the event of a council ceasing to be able to perform its proper functions because of a variation in the area of its area board, the Minister has power to dissolve it and to appoint a new one appropriate to the changed area.

The duties of the two groups of consultative councils (which will be developed in more detail later in the chapter) include:

- (a) considering any matter affecting the supply of electricity or gas in the area, including the variation of tariffs (and also of the bulk supply tariff in the case of the electricity councils in

England and Wales) and the provision of new or improved services or facilities within the area, whether as the subject of a representation made to them by consumers or other persons requiring supplies of electricity or gas in that area or because they (the councils) themselves judge it to be a matter to which consideration ought to be given; and, where action appears to be necessary, notifying their conclusions to the area board (or, if about the bulk supply tariff, to the Central Electricity Generating Board, after consultation with the area board, in the case of the electricity councils in England and Wales); and

- (b) considering and reporting to the area board (or the Generating Board) on any such matter which may be referred to them by the board (or by the Generating Board).

In addition, the councils are entitled to be informed by their area boards of the latter's plans and arrangements for exercising and performing their functions under the acts and can make representations to the boards concerning them. The further channels of representation open to the councils above area board level, which we have referred to briefly above, will be dealt with later, when we come to discuss consumer complaints and policy consultation and representation.

The duties of the district or local committees of the councils include considering the particular circumstances and requirements of their localities in connection with the supply of electricity or gas and making representations about them to their councils. They are also charged with receiving on the councils' behalf any representations from consumers in their localities.

Membership and Staff

Each consultative council, in both industries, has a membership composed of a chairman, who is appointed by the Minister of Power (or by the Secretary of State for Scotland), and 'not less than twenty and not more than thirty other members', also appointed by the Minister (or by the Secretary of State for Scotland). For the electricity councils, not less than two-fifths or more than three-fifths of the members must be appointed from 'a panel of persons nominated by such associations as appear to the Minister to represent local authorities in the area', the remainder being appointed, after consultation with such bodies as the Minister thinks fit, to 'represent agriculture, commerce, industry, labour and the general interests of consumers interested in the development of electricity in the area'. For the gas councils, exactly corresponding requirements apply, except that the local authority representatives

must amount to not less than half and not more than three-quarters of the total membership and there is no provision for a representative for agriculture. In making his appointments, the Minister is required to have particular regard to the ability of the persons under consideration to exercise a 'wide and impartial judgement' and also, in the case of those representing agriculture, commerce, etc. (which they do in a personal capacity), to their having 'adequate knowledge of the requirements of the interests to be represented'. Membership of the House of Commons disqualifies a person from being appointed as chairman of a consultative council but not from being appointed a member. Both the chairmen and the members of the councils are appointed for a period not exceeding five years and are eligible for re-appointment. The Minister also has the power to remove, as well as to appoint, a chairman or a member.

Membership of the district or local committees of the councils tends to be based on a similar composition, depending upon the actual 'schemes' submitted by the councils for the Minister's approval. Subject to these approved schemes, the appointments of members to the committees are made by the councils themselves. Members of the councils are also *ex-officio* members of the committees in whose areas they reside or have business interests.

The importance of the human element in the proper functioning of the consultative councils needs little comment. Upon it depend not only the effective despatch of the more mundane and routine work that the councils have to undertake but also their real effectiveness in promoting their consumers' case and in building up and projecting a helpful public image. And, of the persons involved, it is the chairmen of the councils who, most of all, are responsible for setting the standards of achievement.

Chairmen

The salient feature attaching to appointment as chairman of an electricity or gas consultative council is that it carries with it part-time and paid membership of the area board. The implications of this are of some importance. It is an arrangement which, not unexpectedly, has given rise to much debate in the past and even continues to do so today. Many have felt that this 'running with the hare and hunting with the hounds', as one critic put it, must inevitably undermine a chairman's independence to act in the consumers' interest and involve him in awkward conflicts of loyalty. Because of this, we have looked closely into this dual aspect of the chairman's role and deal with it here in some detail. We have also sought the views of the chairmen themselves as to how they have found the arrange-

ment to work in practice. The verdict from this source was overwhelmingly in its favour.

That certain disadvantages of this dual role could become manifest, a few of the chairmen did concede. One of these was that the chairman's independence, while in fact unimpaired, might come to be suspected by the public in view of his board membership. Another was the danger of becoming too involved in activities of the board which had little essential bearing on consumer considerations, so that the latter came to suffer by neglect. A third was that, since membership of the board entailed joint responsibility for board policies and decisions, this might inhibit a chairman's readiness to pursue, if need be, an independent consumer line, once a policy had been adopted or a decision taken. But, even though such weakening developments might arise, it seemed that in fact they rarely did. The *ex-officio* nature of a chairman's appointment to his area board was the safeguard and enjoined upon him the priority of his consumer consultative role. One or two chairmen did in fact say that they always stressed the *ex-officio* nature of their board membership. And even the few chairmen who had thought that there might be a conflict of loyalties when they had first been appointed said that they had soon discovered that this was not in practice the case.

On the other hand, the arguments in favour of a council chairman having a place on the board were impressive—and, in our view, decisive. Not only can a chairman put over his council's views at board level but he is able to do so at an early stage. This is especially important. When some new policy or move is being planned by the board, he can represent the consumers' case *before* a decision has been made, when it is much easier to exercise some influence than at a more committed stage. What is more, by coming to learn of likely policy developments before they have been adopted, a chairman has time to sound out his council and to seek their support if he considers that the consumers' interest is sufficiently at issue. Equally, by being fully in the picture himself, so far as the board's activities are concerned, he is able to explain the board's case to his council and, as occasion demands, the necessity for some unpopular measure, such as an increase in tariffs. It is this two-way approach, which his membership of the board imposes, that not only underlines the essentially consultative character of his council but, at the same time, assists the consumer interest, which the council represents, to play a constructive rather than just a negative part in the affairs of the industry. Another advantage is that, indirectly, the chairman's membership of the board confers status on his council and ensures that, when complaints being

handled by it are referred to board officials, they will be promptly and helpfully dealt with.

There is, however, a further advantage which attaches to a council chairman's membership of his board, and one that is apt to be overlooked. This is the greater attractiveness which the position must hold for men of calibre. It must provide added stimulus to those appointed to take a more active interest in the work than they might otherwise be disposed or even able to do and also to spare for it the not inconsiderable amount of time required. At a time when men (and women) of the calibre needed for this kind of work, who can afford, amid all the other calls of livelihood and public life, a sufficient amount of time to undertake it, are becoming all too few, this aspect of the matter is of especial importance—and the more so as social and economic change, on the one hand, and the proliferation of bodies of one sort or another in search of this level of service, on the other, point to the likelihood of a growing scarcity of such persons in the future. Without the status attaching to membership of a board and perhaps even more the challenge and interest of top level participation in the working of a great industry, quite apart from the salary which at least some compensation for lost earning activity elsewhere, it is doubtful if, however prodigal the spirit of public service, the present standard of chairmanship could be maintained; and it seems fairly certain that, in the future, it would decline. There have in fact, we understand, been suggestions that chairmen of consultative councils should give their full time to the job and be paid accordingly. We consider, however, that this would be an unwise move. Not only would it tend to result in chairmen spending more of their time on routine work at present handled competently by the council secretaries but, more important, it would detract appreciably from the degree of independence they at present enjoy. So far as can be judged, the present balance between a paid appointment at board level in order to attract those of the right calibre and the part-time nature of the whole commitment so as to allow of such independence in action as they may need on occasions to exercise seems to be about right.

In making his appointments to the chairmanship of the consultative councils, the Minister of Power (or Secretary of State for Scotland) is not committed to any particular statutory prescription. It is understood, however, that a variety of different factors may influence his selection, depending on the choice of persons available for appointment and the particular needs of the council in question; but it seems fair to assume that the guiding requirements, over and above the ability to exercise 'a wide and

impartial judgment', will be diversity of experience and a record of some achievement. If the backgrounds of current council chairmen in both industries are an indication, they suggest that these general requirements have been met. All of the chairmen seem to have made their mark in one field or another, sometimes in several fields, and to have brought to their work as chairmen a catholicity of experience that ought to be proof against too parochial or too narrow an approach. Many of them come from prominent local business backgrounds, some of them retired and some still active. A number of the electricity council chairmen have been associated with electricity undertakings since before nationalisation; and a number of gas council chairmen, with gas undertakings. A few have come from trade union careers, one has been prominent in journalism and two have service backgrounds. The railways, farming, the coal industry and accountancy are all represented among the careers of others. Active participation, often over many years, in local public life has been a prominent feature in the backgrounds of most of them. One has been Lord Provost of Glasgow and another Lord Mayor of Birmingham. There is among them a lord lieutenant, several deputy lieutenants, a number of justices of the peace and two women (one in each industry). Most of the others have been, or are, members of country, rural, borough or urban councils or active in other spheres of public life. About a third of the chairmen have held office since the early days and about a third are fairly recent appointments. Although the distribution of political party leanings among council chairmen was not a matter with which we were concerned, the indications were that there is a rough balance the country over between the major party affiliations. In any case, there was no evidence or suggestion that their respective affiliations were allowed to influence their work as council chairmen. In all, the impression of commitment by chairmen to their council work, which we have referred to earlier, was, in general, a prevailing impression and one which, in so far as faithful to fact, no doubt does much to account for such success as the councils have achieved. Only in one or two instances was this impression qualified by a hint of complacency, conveying, as it did, an implication that there was little to be done by way of improving either the consultative machinery itself or the way in which it was being worked. On the other hand, in the case of several of the newer appointments to chairmanship, a reforming impact on their council's work was already in evidence.

One further point about the chairmen of consultative

councils has not yet been discussed. This concerns their arrangements for meeting together, in particular with the Minister (or Secretary of State for Scotland), and for forming and representing any collective viewpoints. As, however, these arrangements are bound up with the question of the participation of consultative councils in matters of national policy, they will be dealt with later in the latter connection.

Members of the Councils (and Committees)

The main statutory requirement governing the composition of council membership is that prescribing the obligatory proportions of the membership that have to be drawn from local authority sources. These, as we have seen, amount to not less than two-fifths and not more than three-fifths for the electricity councils (prior to 1957, the lower proportion was a half) and to not less than half and not more than three-quarters for the gas councils. Behind this requirement lies the argument that local authority representatives, because of their knowledge of localities and their contacts with many aspects of local life, are especially well-equipped to provide lay representation of general consumer interests, as distinct from the more specialised consumer interests which have representatives of their own. Opinion regarding the present scale of local authority representation varies appreciably from council to council, depending largely upon the quality of the representatives provided. Some of the councils feel that it is too large and that a smaller proportion would be more satisfactory and would make room for representatives from other special consumer interests which have come to the fore over the years since nationalisation. Others—in particular, one in the north—hold that their local authority representatives constitute their most valuable members, being more regular in attendance at meetings and less apt to slant their views in the direction of a particular interest. Whatever the current balance of advantage attaching to the present arrangements, it is inevitable that the quality of local authority representatives, as of other representatives, must vary from area to area and it is all too likely that, due to the many public calls upon the time of members of local authorities, some of the perhaps less effective members of these bodies may sometimes be nominated to represent them on consultative councils. There does, therefore, seem to us—and we found that similar views were held at a number of council headquarters—to be a need for greater flexibility in regard to the obligatory proportions for this category of member. This, we suggest, might be achieved if the proportions were to be adjusted in both the electricity and the gas

consultative councils to provide for a lower limit of one-fifth and an upper limit of three-fifths. So far as the electricity councils were concerned, this would involve only a reduction in the lower proportion, while for the gas councils it would involve a reduction in both the lower and the upper limits. (We do not see that there is any longer a case for differentiating between the two groups of councils in this respect). If this were done, it should then become possible for councils (subject to the Minister's overriding discretion) to evolve and maintain a membership composition more closely in tune with the particular circumstances of their respective areas than can perhaps sometimes be done under present arrangements.

In the case of the sector of council membership appointed to represent special interests other than local authorities, a very wide range indeed of expertise of one sort or another has been drawn upon for council (and also committee) work. Included the country over among members in this broad category are managing directors and directors of large and small companies, hoteliers, farmers, trades union officials, engineers, scientists, retired civil servants, lawyers, accountants, educationalists, artisans, clerks, housewives and representatives of various women's organisations and social workers. Naturally, the composition of this category of membership varies as between councils, but in no instance does it appear to be on a restricted footing. And, although these members are there to represent particular interests and must have an 'adequate knowledge of the requirements of the interests to be represented', they are expected, none the less, to take a wide rather than a narrow view of the consumer problems that come up for discussion.

Almost entirely absent, however, from the list of organisations called upon to nominate specialised members are any of the local consumer groups which have come into existence during recent years. No doubt this is largely accounted for by the fact that such groups had not been formed when the special interests to be represented were originally laid down. But, since the groups are specifically organised to further the consumers' interests as such and range, in their activities, over the whole consumer front, it did seem to us that this was a matter worth looking into. When questioned about it, however, the majority of the council chairmen were found to be against the idea of having representatives from these groups on their councils (though any decisions in the matter must, of course, rest with the Minister) and did not seem disposed to have them either on their district committees. Most of them felt that the consumer was sufficiently well represented already.

All of their members, it was stressed, were consumers' representatives, regardless of the organisations which had nominated them. One chairman thought that consumer group representatives might be too partisan for what were consultative, and not just consumer, bodies; another, that they might be too one-sided and thus fail to exercise the 'wide and impartial judgment' required of all their members; a third pointed out that, while the groups were mostly confined to urban areas, councils and committees had to cover rural areas as well. But the most substantial objection seemed to be that, in many of the council areas, such consumer groups, if they existed at all, did not appear either to be very active or to have made the sort of impact locally that would justify their representation on consultative councils or committees. On the other hand, there was support in principle from a number of chairmen. Two of the electricity council chairmen were ready to consider on their merits any applications from these groups for membership of the district committees. Three of the gas councils were in process of looking into the desirability of seeking nominations from such groups for their district committees and one had put up the matter to the Minister. Only one council—a gas council in the north—actually had consumer group representatives on its committees and had found them to be extremely useful; though one other had a consumer group member on a committee as a local authority representative. While we ourselves feel that, in principle, the extension of representation on these consultative bodies to local consumer groups would be desirable, it is clear that the real justification for this must be provided by the groups themselves in so far as they can come to be sufficiently active in their localities. Until they do this, any consideration of them in this connection must go by default.

The practices obtaining in individual councils regarding the reappointment of existing members and the appointment of new ones vary considerably. Although all appointments are made by the Minister, the influence of the chairmen on them is clearly powerful. Quite apart from the inevitable wastage through death or retirement, each council seems to have its own distinctive balance as between the need for continuity, on the one hand, and for new blood, on the other. Thus it is that the actual turnover of members follows no discernible pattern. Some councils report a very small turnover; others, quite a heavy one. In one council, a completely new set of members is appointed every four years, no re-appointments being made without a break. So far as the reappointment of individual members is concerned, the most regarded of the qualifications on which this

appears to be based is their record of attendance at meetings. In general, from such figures as were made available to us, the levels of attendance at council meetings seem to be quite high, ranging from between 60 per cent to 80 per cent, but mostly between 70 and 75 per cent. Attendance at committee meetings tends to be around 10 per cent lower. The readiness of a member to take a broad, rather than a parochial, view on matters under discussion is another quality which, it is understood, weighs when he comes up for re-appointment; so, too does active participation in the proceedings, as distinct from mere attendance. There seems also to be a growing tendency to encourage the appointment to councils of those who have already demonstrated their usefulness as members of committees.

Behind the problems of selecting persons for appointment as members of the consultative councils (and committees), there is, however, a consideration of some importance that tends to be overlooked. This is the fact that (with the partial exception of the chairmen of the councils) all membership is on a voluntary basis and, as such, is unpaid (except for certain basic allowances, to cover loss of remunerative time and travelling expenses, provided for under the relevant acts). This carries two significant implications. In the first place, it means that, since men (and women), already very busy in their own fields, where presumably lie their major commitments and their major rewards, are willing to devote virtually unpaid time to the work of consultative councils and committees, they must at least regard that work as being worthwhile. And the few attendance percentages quoted above would seem to bear this out. In the second place, it means that, since the persons concerned are able to devote to the work the time required, they must be so placed as to have a sufficient degree of mastery over their workaday timetables to allow them to do so. Inevitably, this latter requirement sets a premium on the older man, the man who is in some top executive or professional position or who is self-employed or retired. And, so far as we were able to judge, the majority of the members are in fact within the 50-70 age group, with perhaps an average age of somewhere around 55. In general, it can perhaps be argued that such an age orientation is to the good for the sort of work that the councils and committees are called upon to do. On the other hand, it is difficult to believe that an infusion of younger members, if this could be brought about, would not have a vitalising effect.

It is when one considers the voluntary basis of the membership of these consultative bodies, with its dependence on willingness and ableness to serve, that there is brought to the fore the whole question of the

likely availability of members of the requisite quality and range of interests in the future—a question which, as we have seen, is not without its relevance in the case of the chairmen of consultative councils. Can the present scale of supply of such persons for voluntary public work be maintained anyway, since, as a consequence of economic change, to use their working hours gainfully is becoming for almost everyone a matter of necessity rather than of choice? And, even if it can, will not fewer and fewer of these people be available to the consultative bodies themselves as other bodies come into existence which, perhaps because of higher status or perhaps a more dramatic role, are able to attach greater enticements to their demands for voluntary public service? While we are not able to advance any objective assessments in answer to these two questions, we consider that they should be brought firmly into focus whenever thought is being given to future developments in the consultative machinery. When it is considered that the fourteen electricity consultative councils and the twelve gas consultative councils have together a membership of over seven hundred, and their respective committees a combined membership of well over two thousand, it becomes difficult to see how the councils and committees can continue to have available to them in the future a voluntary membership on the scale and of the quality that they have had in the past. Since to do away with, or even to modify, the voluntary principle would defeat the whole purpose and conception of the consultative machinery and virtually obliterate its independence, the need may have to be faced for having smaller councils, say of twelve to eighteen members instead of, as at present, twenty to thirty, and, even more, for contriving a sizeable reduction in the overall membership of district committees. It is true, of course, as the attendance figures seem to indicate, that there appears to be at present no pressing urgency about this matter and, in certain areas at least, it may be years before the full pinch is felt. But, in a study such as this, it would be unrealistic not to draw attention to this aspect of membership in its more general setting, more especially since it is related to certain other developments in the consumers' interest which we will be considering later.

Secretaries and Staff

Subject to the approval of the Minister 'as to numbers', a council may appoint such officers as appear to it to be requisite for the proper exercise and performance of its functions (including the functions of its district or local committees). In practice, this means a secretary and supporting junior staff.

The secretaries are key functionaries in the working of the consultative councils, second only in importance to the chairmen. Upon them rest responsibility for all the routine administrative work of the councils and, in a majority of cases, of the district, or local, committees as well. The secretaries are also focal points for the reference of consumers' complaints which do not get settled satisfactorily at board showrooms or at district committee level. Upon their efficiency and enthusiasm much of their council's effectiveness depends.

As in the case of the chairmen, the secretaries do not fit into any uniform pattern. While most of them have a background of association with their industry, sometimes extending over very many years and generally, though not always, on the administrative or secretarial side, others have come to their present positions from the law, accountancy, local government, the overseas services and the army. Two of the gas council secretaries are women and also one of the electricity council secretaries. Several of them in each industry have held office since the councils were first set up, but more, especially in the electricity consultative councils, have been appointed within the last five years.

The most significant dividing-line, in both industries, however, is that between the secretaries whose council appointments are full-time and those whose appointments are only part-time. In the electricity industry, there are eight full-time and six part-time secretaries of consultative councils and, in the gas industry, ten full-time and two part-time. While it is no doubt true that the volume of work with which secretaries have to deal varies considerably from council to council, it does seem to us to be less than satisfactory for a secretary not to be at the full-time disposal of his council. Not only does it suggest that the council is perhaps not so active as it might otherwise be but it is difficult to believe that it does not entail some dilution of the council's independence. To hold responsible positions in their area board organisations, as a number of council secretaries do (included among the positions held being those of a deputy secretary, an assistant secretary dealing with labour relations and establishments, an industrial relations officer, an assistant solicitor and various other administrative appointments), is, despite whatever advantages in the form of closer liaison between council and board officials may accrue, to impose on the secretaries concerned a division of time, interest and loyalty which to some degree must detract from their contribution to one or the other, and perhaps to both, of their jobs. As the board job, if it is an important one, is probably the more exigent in its demands, this must tend to

mean that the council's work has to suffer. It is notable that, whereas all of the full-time secretaries are responsible for the secretarial work of their council's district or local committees and attend all of the meetings of these committees, only two of the part-time secretaries (one of whom has an assistant secretary to help him) do so. And, in several of the electricity council areas, the district committees are serviced by the board's own area secretaries. It might, of course, be argued in favour of this part-time system that it makes it possible for a man of higher income-earning potential to be made available to serve the council as secretary, even though he can devote only a portion of his working time to the task. Whether or not there is any case in practice for this argument, we are not in a position to judge; but, when set against the loss of independence to the council and probably also of its full effectiveness in action that must seem to be involved, we do not consider that it can outweigh a council's need for the full-time services of its secretary.

By far the majority of the council secretaries in both industries, whether full-time or part-time, are paid as seconded officials of the local boards, the secondments being on a permanent or quasi-permanent basis in the case of those who are full-time and carrying inclusion in the boards' superannuation schemes. A few of the full-time secretaries have no official connection with their local boards but are covered so far as superannuation arrangements are concerned. There is no evidence to suggest that any of these full-time secretaries, even when in a seconded capacity, suffer from interference by the boards or have their independence in their consultative council capacity in any way curtailed. There is, of course, a tie of financial dependence, but this is part of the larger problem of the financial position of councils which we will be looking at later.

Looking to the future, there appear to be grounds for suspecting that the recruitment of new secretaries at the requisite calibre level could well become increasingly difficult. For the fact of having to remain, as under present practice, in the same job over a long, often indefinite, period of years without any discernible promotional ladder ahead, while it may suit those who wish to fill in the years usefully until retirement, must tend to discourage many of the younger men and women, otherwise well equipped for the work, when set against the more tangible enticements now being increasingly held out to them in so many other fields. It is true, of course, that the work carries with it a sense of public service and the challenge of an unending variety of human problems to be dealt with, both of which can

provide satisfactions of their own not perhaps always to be found in otherwise more rewarding fields. Certainly, among the present generation of secretaries there is no evidence of any lack of enthusiasm for their work, even among those who have held office since the early days of the councils—in fact, one or two of the most enthusiastic and dedicated are among this number. But, unless steps are taken to enhance the more overt attractions of the job, by improvements in pay and prospects and also perhaps by the provision of more adequate staff, it is difficult to see how a falling-off in standards in the future will be avoided. And, if this happens, the work of the consultative councils must inevitably suffer.

Though we did not enquire into the question of staff below the level of secretary, we received the impression that, in some of the councils, it was less than adequate. Some, it is true, were well provided with junior staff and, in one or two cases, there were assistant secretaries. But, in the case of one gas council, the secretary had had to do all his own typing for seventeen years and had only been given a typist within the last year. This sort of niggardliness in the provision of staff cannot do other than handicap the work of a council and damage its image. In the matter of staff, there is also the wider question as to whether a secretary should be backed up by a small staff of experts, who could give professional advice on some of the more specialised matters which come before his council. Though there have been suggestions that some move in this direction would be to the good, we do not think that, with their present scope of work, there could be any justification at this local level for what would be a costly development. At the national level, the position is rather different; but, even here, there are difficulties. These, however, will emerge in a later connection.

There is one further point to be discussed about council secretaries. This concerns their arrangements for liaison with one another. Different as are individual council areas from one another, there is a great deal of common ground between them, more especially in regard to policy matters, and a fund of accumulated experience to be shared that underlines the case for close liaison. So far as the electricity consultative councils are concerned, some provision has long been made for this through the medium of an annual conference of secretaries, where, in addition to a planned agenda, the secretaries have ample opportunity to get together and to discuss their mutual problems and exchange ideas. Nearly all of them regularly attend these conferences and, with few exceptions, have found them to be very helpful.

The secretaries of the gas consultative councils have no such arrangement, which we feel to be a disadvantage. Several of them are in favour of holding such conferences and there seems little doubt that only good could come from the opportunity for a cross-fertilisation of ideas which such encounters would provide. More informally, a number of secretaries in both industries have made a point of establishing relations with secretaries in adjoining areas, exchanging information and published reports, and one has taken the initiative on a countrywide scale. A few, too, have had some liaison with their gas or electricity counterparts in the same area, a development which we consider should be encouraged.

Working Arrangements, Location and Finance

Broadly, the system of working practised by most of the councils in the two industries is for local matters and complaints to be handled as far as possible by their district or local committees and for the councils themselves to concentrate on policy matters and on complaints which have a general or policy angle. There are, of course, many variations of the way in which this system is applied, the details of which we cannot, and do not need to, enter into here; but substantially it is prevalent in almost all council areas. In addition to their district or local committees, which they are obligated to set up under enactment, many of the councils have also set up their own special committees or sub-committees to deal with such matters as tariffs, nominations, publicity and the like. One of the gas councils, for instance, has a working party to look specifically into matters referred to it by the council, while an electricity council has a chairman's advisory committee whose task it is to give early consideration to area board proposals.

The councils, and also their local committees, meet at least four times a year, and often five or six times, the meetings frequently being held in different centres. Many of the councils hold a meeting jointly with their committees once a year, usually when area board officials are present to explain and answer questions about the boards' annual report and accounts. The formal communications link between consultative council and area board is between the secretary of the one and the secretary of the other. More commonly, however, and to save time, especially in regard to the settlement of complaints, the practice has grown up in most councils for the secretary to communicate directly with the board official concerned, either at headquarters or in the localities, reserving the more formal procedure for policy issues which need to come before the board.

Again, the practice varies a lot as between individual councils, but, in general, it conforms to this broad pattern.

There are three main headings under which the work itself of the councils can be most conveniently studied—the settlement of complaints, policy consultation and representation and the cultivation of public awareness. But before discussing these, which we will be doing, in turn, in the next three sections, there are two organisational aspects of the councils which we need first to discuss, since they have a bearing of some importance on the vital issue of the councils' independence. One of these concerns the location of offices, the other concerns sources of finance.

Location of Consultative Council Offices

There is a fairly clear-cut division both of practice and of opinion among the consultative councils in the two industries in regard to the location of their offices. Eight of the gas and five of the electricity councils have offices that are quite separate from those of their area boards. Of the others, some have separate offices in the same buildings and some separate entrances and separate telephones, but essentially their accommodation is to a greater or lesser degree shared with their boards. And, as with the practice, so with the opinions voiced as to the balance of advantage for or against separateness of location. Those councils which are separate tend to be emphatic in regarding this condition as vital to their independence; those which are not tend to be equally emphatic about the advantages of close liaison with their boards. These latter advantages include ready and frequent personal contacts between council staff and board officials, especially helpful when dealing with complaints, with their saving of time over less direct means of communication; a saving in costs, coupled with easy access to such board facilities as secretarial assistance, duplicating and the like; and the possession of generally adequate offices and also of a fairly well-known address which obviates the danger of being hidden away in what may be small and inadequate offices that are difficult to locate. Against these quite substantial advantages of convenience and time and cost saving, the case for having entirely separate accommodation rests very largely on the fact that such an arrangement conveys to the general public a more overt image of independence and makes the council less likely to be suspected of being a 'stooge' of the board and in collusion with it against the consumer. It is also bound up with the possession of a full-time secretary, since it is not generally practicable for a part-time secretary, with a board job to do as well, to be based

away from board offices. It is no coincidence that, with few exceptions, full-time secretaries and separate offices go together for both the electricity and the gas councils. Only recently, one electricity council in the midlands, having arranged for its secretary to become full-time and to relinquish a previously held part-time board position, has at the same time moved away from its offices in the board's headquarters to a quite separate set of offices of its own some distance away. The new offices are sufficiently spacious to allow of the council holding meetings there and to provide a comfortable waiting room for consumers who come to it with their complaints.

In our view, while fully appreciate of the arguments on both sides, the case in favour of completely separate establishments for the councils is on balance the stronger when looked at from the consumers' point of view. To be *seen* to be separate, over and above the actuality of being separate, has an intrinsic importance of its own for organisations such as these: they must appear to be independent as well as be independent. To say this, however, does not mean in any way to minimise the need for close co-operation between chairmen and secretaries of councils, on the one hand, and board members and officials, on the other, or to undervalue the existing structures of co-operation between them that have been built over the years. And, in so far as individual councils which have not already done so move into separate offices, it is of first importance that they do all possible to safeguard their working relationships with their boards and to avoid unnecessary disruption. Moreover, a separate office needs to be adequate in size, equipment and setting if it is to be fully efficient and to build up a publicly recognisable identity of its own. This, however, is connected with the question of finance.

The Financing of the Councils

Though both groups of councils are formally independent of their industries and responsible to the Minister of Power (or the Secretary of State for Scotland), it is by the industries, however, that they are financed and not by the Minister (or the Secretary of State). None the less, the broad scale of the financing is determined by the Minister with the approval of the Treasury. In the case of the twelve electricity councils in England and Wales, by far the greater portion of the funds provided comes directly from the Electricity Council and not from the area boards—though, of course, the money comes ultimately from the earnings of the boards. The funds from this source cover expenditure on staff salaries and allowances; allowances paid to members

of councils and committees for any loss of remunerative time, travelling and out-of-pocket expenses; and such other approved council expenditure (e.g. on publicity) as may be necessary. The total of this expenditure appears as a block item in the Electricity Council's annual report and accounts and amounted in 1966-67 to £61,530 for the twelve councils. The two Scottish electricity consultative councils, however, being outside the jurisdiction of the Electricity Council, derive their funds for these items of expenditure directly from their area boards. Provision for office accommodation for all councils is the responsibility of the area boards and is dependent on what *appears* to the board 'to be requisite for the proper exercise and performance of their (the councils') functions' or on what the Minister may direct. Also the responsibility of the boards is payment of the salaries of council chairmen in their capacity as part-time members of the boards. In the case of the twelve gas consultative councils, on the other hand, all of their funds come directly from their area boards, none whatever being provided by the Gas Council itself. It is directly to their boards, therefore, that they must look for the payment of staff salaries, staff and members' allowances and other requirements, as well as for office accommodation and, of course, the payment of chairmen's salaries.

There are two aspects here, regarding the financing of the councils, which seem to us to call for comment. One of these concerns the scale of finance involved; the other bears directly on the independence of the councils.

On the first of these, it is worth noting how extremely modest are the financial demands made by the councils on their respective industries. Excluding the chairman's salary and the cost of office accommodation, the average cost for each electricity council is currently around £5,000 a year and for each gas council rather less than £4,000 a year—in each case a microscopic percentage of its industry's total expenditure. While there is, of course, every reason for eliminating unnecessary expenditure and also for discouraging 'empire-building' for its own sake, there can clearly exist no reasonable financial case against an enlarged scale of expenditure as and when it is genuinely needed to improve the effectiveness and service of the councils. The provision of adequate and well-located separate offices is one direction in which a more generous scale of expenditure would, in our view, be well justified; better terms of service and, where needed, more assistance for secretaries perhaps another.

The second aspect of council financing which calls for comment is the implication it could be thought

to carry of an independence qualified by the strings of financial dependence. With very few exceptions, all of the council chairmen and secretaries, when questioned on this point, maintained that the present system did in fact work very well and that, due to the ready co-operation of their boards, they did not feel trammelled in any way. Their financial requirements were small and, if any more centralised or remoter source were to be drawn upon for funds, they feared that delays and added paper work would more than offset any possible gain in independence. One or two councils thought that there was, at least in principle, a case for the Ministry rather than the industry to be the source of finance; while another, having encountered some difficulty in persuading its board to provide some needed equipment for its separate office, argued more positively for councils to have greater independence of their boards in regard to such basic finance.

While we wish in no way to question the helpfulness of area boards in this connection, there does, none the less, appear to us to be some grounds for removing or reducing *local* financial strings which, if not inhibitive hitherto, could conceivably become so, perhaps under financial stress or in the event of the councils needing to meet a significant growth in demand for their services. So far as the bulk of their expenditure is concerned, the electricity councils are in a better position than the gas ones. The fact that they draw their funds for this expenditure centrally from the Electricity Council and not from their area boards must give them inevitably a greater sense of freedom in their work. We feel (assuming that the system of direct financing by the industries continues—a point on which we comment in the next paragraph) that the adoption of a similar arrangement for the gas industry, with the gas councils drawing their funds for equivalent expenditure directly from the Gas Council instead of from their area boards, would be an improvement. Furthermore, we consider that funds for council offices, at present provided by the area boards in both industries, would also be better supplied centrally by the Electricity Council and the Gas Council, respectively. In the case of the board paid salaries of council chairmen, these do not raise any problems. The position of chairmen as board members is, as we have seen, on an *ex-officio* basis and, unless any of them happen to be in circumstances which leave them excessively dependent on their part-time salaries—and this, we understand, is rarely the case—this is not a consideration likely to influence their independence of approach to their consultative council duties.

There remains, however, the further question as to whether in fact expenditure on the consultative

machinery should remain the direct responsibility of the industries concerned or whether it should be made a charge on the Ministry of Power (or the Office of the Secretary of State for Scotland). As the councils were set up by acts of Parliament and the relevant appointments to them are made by the Minister (or the Secretary of State), there would seem to be a good case, in principle, for the latter alternative. This, too, is strengthened if account is taken of the fact that occasions may arise when, in pressing the consumers' case, the councils may have to go against their industry and beyond it to the Minister himself. Against this, there is the argument that the administrative delays and complications to which a ministerial source of finance might lead could more than nullify any possible advantages. While we ourselves incline to the view that the independence of the councils would be better served if their financial support were to come from the Ministry rather than from the industry, we would at the same time agree that the arrangements adopted should not be such as to result in added administrative handicaps or lead to a lessening of the councils' present autonomy in the expenditure of funds made available. Equally, it would be important that a ministerial source of finance should not itself be allowed to inhibit the councils, if they felt called upon to take a consumer line independent of, or even at variance with, that of the government of the day.

Consumer Complaints

The initiative in bringing any matter to the attention of electricity and gas consultative councils can come from three different sources—from the individual consumers and other users of the services provided, from the councils (or their committees) themselves and from the area boards (and also, in the case of the electricity councils in England and Wales, from the Central Electricity Generating Board). In this section, it is with the first only of these sources of initiative that we shall be dealing; the other two, being almost wholly concerned with policy matters, will be dealt with in the section following when we shall be discussing policy consultation.

In the relevant acts, approaches to the consultative councils made by consumers are referred to as 'representations'. This particular nomenclature, rather than the more familiar one of 'complaints', continues to be adopted, at least in their more formal utterances, by quite a few of the councils, one of the electricity councils going so far as to exclude altogether the use of the term 'complaint'. There is, of course, some merit in this practice. The term 'complaint' has an essentially negative connotation

and in its strictest sense is necessarily limited to initiatives urging the putting right of things that have gone wrong, or are alleged to have gone wrong, and is thus exclusive of positive proposals or suggestions for actually making things better. 'Representations', on the other hand, can comprehend both negative and positive initiatives: they can be concerned to show up weaknesses or failures or to indicate how services might be improved. Moreover, it appears, from the wording of the acts, to have been at least in part the intention that representations made to the councils should embrace these two kinds. Several at least of the councils are alive to the more constructive potential of consumer representations and one of them—the London Electricity Consultative Council—does in fact go out of its way, in one of its notices, to state that among the things it will consider are 'ideas for improved service'. Yet the fact remains that all too few of the representations received from consumers take this form; the overwhelming majority are in the form of complaints about one aspect or another of supply, appliances or servicing. That this should be so is, of course, to be expected. Only those who are sufficiently moved by a sense of grievance or injustice will, in general, themselves go to the trouble of raising an issue; few, usually very few indeed, will be prepared to take an independent initiative aimed at more general betterment. None the less, it does seem desirable to keep this more constructive option open to consumers and perhaps to try to do rather more to encourage them to exercise it in the future.

In regard to the actual range of matters which can be the subject of representations to the councils, the wording of the acts leaves room for some misunderstanding. The councils may (according to section 7, sub-section 4(a) of the Electricity Act of 1947 and to section 9, sub-section 4(a) of the Gas Act of 1948) consider, in response to representations, any matter affecting the distribution of electricity or the supply of gas in the area, 'including the variation of tariffs and the provision of new or improved services and facilities within the area', notifying their conclusions to the area board if they consider action to be necessary. It is not clear, however, from this wording whether the phrase 'improved services and facilities' can rightly be taken to include the supply, fitting and servicing of appliances, which have come to account for an increasing proportion of representations during recent years. The majority of the councils, it seems, have come, if tacitly, to accept that it does and to deal with such representations accordingly. Several of the councils, however, seem to feel rather inhibited by the wording as it stands, though we believe that its wider interpretation is now favoured

by the Ministry. None the less, we feel that perhaps the time has come for the wording of the relevant sub-sections to be amended so as to be more specifically inclusive of this now important subject area of consumer representation.

Sometimes included among the 'complaints' which reach councils or their committees are enquiries or requests for information. These, however, tend to be very few—perhaps not more than about one or two per cent of the total. Since the provision of information facilities is a responsibility of area boards rather than of the councils, those making the enquiries are generally directed to the appropriate board official or department.

In what follows, we shall be talking almost exclusively about representations which take the form of complaints as such and will also be referring to them as such. These have a twofold importance. For the consumer, they provide him with a means of seeking protection or redress in a field in which the competitive options open to him are necessarily limited; for the industry, they serve to spotlight defects or failures that call for remedy and help it to build up a clearer and fuller conception of consumer requirements. Between the two are the consultative councils, drawing much of the raw material for their consultative work from these complaints and deriving from them their direct contacts with actual consumers.

Complaints Procedure

The generally accepted and practised procedure, in both the electricity and the gas industries, for the processing of consumers' complaints up to consultative council level is for the complaint to be taken first of all to the local electricity or gas office or showroom; then, if this fails to satisfy, to the appropriate district or local committee; and, if this fails also to satisfy, to the consultative council itself. The merit of this procedure lies in the principle that it is generally better to try to get the complaint settled at a low level before taking it to a higher one. This way, not only is there a saving in everybody's time but it is made possible for those complaints which do need to be taken up at a higher level to receive greater attention. Since almost every complaint has to be referred sooner or later to the appropriate board office for remedy or explanation, and since most boards now have special departments or arrangements for dealing with customers' problems, it is an obvious first step for the consumer himself to try to get his complaint settled at this level. If however, this is not possible, he can then, by turning to his district or local committee, draw upon his local knowledge of such problems and have the

benefit of its higher level of approach to the board's hierarchy. If still not possible of settlement, or if a more general issue is involved, then his complaint properly becomes a matter to be considered by the council itself. In this last event, if the complaint is of sufficient importance or its policy implications warrant, it can be brought to the attention of the area board by the council's chairman.

It sometimes occurs, however, that a consultative council is unable to resolve a complaint in consultation with the board, either to its own or to the consumer's satisfaction. In such a situation, there are further steps that can be taken. In the case of an electricity complaint, the council, if itself dissatisfied, can take the matter to the Electricity Council; and, if still dissatisfied, then to the Minister, who can, if he so decides, give appropriate directions to the area board. If, however, the council is satisfied but the complainant is not, the latter, whether an individual or a body, may submit a representation direct to the Electricity Council. The Electricity Council, after studying the relevant documents and, if required, seeing the complainant (or complainants) in person, can then either support the consultative council against the complainant; or it can advise the area board to take remedial steps; or it can represent the matter to the Minister, who will give or not such directions to the area board as he sees fit. In the case of gas complaints, the position is rather different. If the consultative council is dissatisfied with the outcome of its representation to the area board on the consumer's behalf, it may take the matter direct to the Minister. The Minister will then first of all consult the Gas Council and, following upon this, if he concludes that there may be a defect to remedy, he will refer the matter 'for inquiry and report by a person appointed by him after consultation with the Lord Chancellor or, in the case of the Scottish Gas Board, after consultation with the Secretary of State'; and, when, but not until, he has considered the report of this person, he will decide whether or not to give any directions to the area board concerned. On the other hand, unlike the electricity consumer, the gas consumer has no further avenue of representation open to him if the consultative council decides against taking any action on his complaint beyond area board level.

While all of the electricity and gas consultative councils try to adhere to the 'ideal' procedure described above for processing complaints up to council level, and also try to encourage consumers to do the same, the actual practices of individual councils vary considerably from one to another in regard to matters of procedural and administrative detail. That this should be so is, of course, to be

expected and is in line with the diverse circumstances and needs of individual councils and with their differing structures of personal relationships referred to at the beginning of the chapter. While it is not possible here to go into all these differences of practice, a few can be briefly mentioned. For example, some councils like all complaints, whether settled at district committee or council level, to pass through the hands of the council secretary and to be recorded in the council secretariat; others are quite happy for their committees or for individual members of committees to settle complaints on their own. Some of the secretaries make a point of visiting or seeing complainants personally when the latter's complaints reach council level; and a few of the chairmen do likewise. In the case of those councils which have full-time secretaries who also act as secretaries of the district or local committees, information about complaints in their areas tends to be on a more comprehensive basis and the processing of them to follow a more consistent pattern.

While the majority of consumers take their complaints direct to board offices or showrooms—as our own field survey also showed—where the complaints are generally settled satisfactorily without reference to the consultative bodies, there are always some who act in disregard of this procedure, no doubt because they are unaware of it. Of these, some go straight to the consultative council itself, quite often confusing it with the board office, some to a district committee and some to individual council or committee members. In some council areas, individual members are quite active on the consumer's behalf, dealing with complaints that are brought to them independently of committee or council. Usually, there are few, if any, records of complaints which are settled in this way. Even in the case of complaints settled by committees, there are no reliable figures available to assess them in relation to those dealt with by councils. One electricity council secretary puts the proportion as high as ten complaints settled by the committees to one by the council. This, however, seems unlikely to be a representative figure, as the proportions in other council areas are probably very different.

In so far as any case may be argued for greater standardisation of some of the more detailed practices of individual councils in dealing with complaints—and it seems rather doubtful as to whether it can, except perhaps in the connection suggested below—this would seem to be a matter mostly for the councils themselves to work out, in the light of their own experience and of such interchanges of ideas as take place at meetings of council chairmen and (in the case of the electricity councils)

council secretaries, and not one for central directives. The yardstick here must be the strictly pragmatic one as to how well the actual practices work 'in the field'.

Trend and Pattern of Complaints

There is, however, one practice in regard to which we feel that greater standardisation across the country would be of advantage both to the councils themselves and to their industries in interpreting the consumer's needs and difficulties. This is the collation and provision of statistical records of complaints. At present, such records do not appear, in general, to be very helpful. Of those that are published, comparisons between them are usually handicapped by the fact that the figures are based on different systems of record-keeping. Some of them relate only to those complaints which reach the council; others include complaints dealt with by the committees as well; almost all exclude many, if not most, of the complaints dealt with by individual council or committee members. If a comparative basis of assessment and classification were to be agreed upon by the councils of each industry, then a clearer picture could emerge of both the national and the local trends and patterns of complaints.

But this is only part of the problem of making use of complaints statistics. A further difficulty that arises is that it is far from certain as to what the figures themselves really imply. If the yearly total of complaints is large, it may be because the council concerned is well publicised locally and consumers have grown accustomed to using it; or it may simply mean that complaints are being brought to it or its committees which could be readily resolved by board officials. On the other hand, the total may be large because there are ample grounds for complaint, due perhaps to some defects of operation on the part of the board or perhaps to an unusually rapid build-up of consumer demand which has over-taxed the board's available capacity and staff. Similarly, a small number of complaints may indicate that grounds for complaint are few or that most of them are being effectively disposed of at board showroom or committee levels. Or it may be due to inadequate council publicity. Thus, even when available, complaints figures need to be treated with reserve and to be looked at in the context of these various considerations. It is certainly unwise to rely upon them as a criterion of a council's efficiency.

None the less, from such figures as are published about complaints in council annual reports, a few indications emerge. One of these is that the numbers of complaints reaching the councils are gradually, if slowly, increasing year by year, even though for individual councils this may not always seem to be

the case. That this is so is, of course, not surprising when account is taken of the expanding use of electricity and gas appliances and of the recent spread of central heating. The average number of complaints handled by those electricity councils which published figures for the year 1965-6 amounted to 357. The North Eastern Electricity Consultative Council, with 666, had the highest total for the year, the Yorkshire Electricity Consultative Council, with 117, the lowest. In the case of the (fewer) gas councils which published complaints figures, the average for the year was 395, the South Eastern Gas Consultative Council being well ahead with 1644 and the Northern and the Scottish Gas Consultative Councils having the least with 98 each. No very coherent pattern, however, emerges from such breakdowns of complaints as are available. Disputed accounts, meter readings, tariff increases and, increasingly, faulty installation and servicing of appliances and central heating systems, appear to be the main sources of complaint, with rural electrification a declining one as programmes near completion. No doubt over the next few years, there will be a sharp rise in complaints arising out of the introduction of a natural gas supply with its attendant problem of adapting appliances, while current calls in certain areas for external meter reading arrangements seem likely to increase as more and more houses are left unoccupied during working hours. A breakdown of complaints made to the North Western Electricity Consultative Council during the years 1964-5 and 1965-6, and extracted from the Council's annual report, is reproduced in Appendix III(1).

Since most of the complaints which reach council level have a general or policy angle to them, this has led to many policy initiatives being taken by the councils as a result of such complaints. The range and variety of matters which councils have taken up with their area boards for this reason are formidable, as can be seen from a study of the annual reports of the two groups of councils over the last few years. Disconnection charges, prepayment meters, variations in board tariff structures, guarantees, external, meter readings, installation inspection services, unification of gas prices in the area, fixing charges for appliances, manufacturers' servicing delays changing of faulty appliances and cooker safety guards—these are only a random few of such matters. In quite a number of cases, board policy in regard to matters such as these has been modified to meet council representations when these have been practicable as well as desirable. In fact, if it were compiled, a dossier of cases the country over in which some shifts of board policy had stemmed

originally from complaints which had been processed through the consultative machinery would almost certainly prove to be far more substantial than is generally realised. It is perhaps a pity that the facts are at present hidden away in a large number of annual reports. On the other hand, there have necessarily been many cases in which, for cogent reasons but occasionally for less than cogent ones or because of the circumstances prevailing at the time, such representations have had little or no influence on board policies.

While most complaints originate from individual consumers, a proportion does come from bodies, such as local authorities, or business concerns and other institutions, in the area. The proportion is not usually very large, perhaps at most about ten per cent of the total and mostly much less. Large firms in an area, especially in a major urban area such as London, generally have their own fairly high-level liaison with the area boards and do not therefore need to go through the councils—though they may have their own representations on them. Complaints from bodies as distinct from individuals, in particular those from local authorities, tend to reflect a more general discontent and are therefore often of a nature which councils need to take up with their boards. Though fewer in number than those from individuals, the benefits they are able to win for consumers in general are probably very much greater.

Some Comments on the Complaints Machinery

As it stands, the existing consultative machinery for dealing with consumers' complaints in the two industries up to area board level appears to be basically sound. Moreover, as our own observations have confirmed, it is for the most part efficiently and sympathetically administered. Every effort is made to meet the consumer's case or, if that is not possible, to explain to him why it cannot be met. For the councils, of course, as consultative, and not just consumer, bodies, have their two-way task to perform: they must explain the industry's difficulties and limitations to the consumer as well as represent the consumer's complaints to the industry. When a shortage of fitters prevents a board from carrying out work which it wishes to carry out, the inconvenienced consumer has to be satisfied with an explanation until the position can be righted. Or again, if to meet its financial target, a board has to increase its tariff, then representations by the consultative council against the increase are unlikely to be successful so long as, say, the national policy on financial targets remains unchanged. On the other hand, the consumer may have no case to be met

anyway. Very many complaints arise solely from misunderstandings on the consumer's part, more particularly in regard to accounts, and helpful explanations are the most that a council or its committees can provide. Usually, such explanations suffice to satisfy these consumers. But there are always some, mostly only a very few, who are just not disposed to be satisfied or who bring up recurring complaints which cannot be met; and some, too, whose complaints are either unreasonable or frivolous—one gas council, for instance, recently received a representation from a consumer requesting the refund of a deposit made in 1909 for a supply of gas! These latter are, in general, only an unimportant minority, most of them seeming to find in the pressing of complaints something akin to the diversions of a hobby.

In spite of these two limiting factors—the inability, as distinct from the unwillingness, of a board to meet the consumers' case and the weakness of the consumer's case itself—the consultative councils in the two industries do seem to satisfy most of the consumers who come to them with complaints. Figures in this connection are rather scanty and perhaps not always too reliable. But from what we were able to discover from our enquiries, it appeared that the proportions of complaints satisfactorily settled by different councils ranged roughly from 60 per cent (in this instance computed from cards returned by consumers recording their satisfaction) to 99 per cent, with an average of perhaps around 80 per cent. Many, perhaps the majority, of the complaints fell into the 'misunderstandings' category and were satisfactorily resolved by explanations. As independent support for these approximate assessments of consumer satisfaction, it will be recalled that our own field survey (see chapter two) revealed a similar order of satisfaction with the councils.

When it comes to the procedure for referring complaints to higher than area board level, the position is rather less satisfactory in certain respects. So far as the electricity councils themselves are concerned, the procedure, at least to a ministerial level, seems generally adequate. In the case of the gas councils, however, it would, we think, be more satisfactory if they were to follow a procedure similar to that of the electricity councils, taking their complaints first to the Gas Council (which they are not at present empowered to do) and then, if necessary, to the Minister, rather than the present somewhat cumbersome procedure described above. On the other hand, for both the electricity councils and the gas councils, there does seem to be a case for having some further reference, if need be, beyond

that to the Minister, since, when pressed to such a stage, the matter at issue may well call for an independent judgement, taking into full account all the particular circumstances involved, rather than one based on what must tend to be essentially administrative or executive requirements. For this purpose, we suggest that an independent and suitably constituted tribunal should be set up, preferably on a standing basis, and empowered to pass final judgement.

For individual complainants who have failed to obtain the support of their consultative councils, however, the requirements are rather different. The present practice open to electricity complainants in this unsupported category, which, as we have seen, is to take their complaints to the Electricity Council, is, we feel, unsound in principle, notwithstanding the sympathetic and helpful hearing that we have reason to believe is always accorded to such cases by the Council. It would, in our view, at least until a facility is provided centrally of a kind such as we suggest later in the chapter, be more appropriate for such complainants, and equally for gas complainants in the same situation, to refer their complaints to their local members of parliament, who could then take them up, at their discretion and after—but only after—reference of the complaints to the consultative councils concerned for background and comment, with the industry, the Minister or, as necessary, with any tribunal that might be set up on the lines suggested above.

The Problem of Complaints about Equipment from Private Suppliers

During the last few years, however, a relatively new area of discontent among both electricity and gas consumers has been opening up, which has confronted the consultative councils—and the area boards—with problems which, at least statutorily, lie outside their proper field of functioning. This concerns the growing incidence of complaints about defective appliances and central heating installations supplied and fitted by private firms, as distinct from area boards, and about the inadequate servicing facilities these firms provide. To a certain extent, of course, this build-up of complaints no more than reflects the rapid expansion in the use of such equipment generally over recent years and, as a consequence to be expected, the growing volume of purchases of it from private concerns. And, in so far as these private suppliers, long established in the electrical industry but only recently beginning to make major inroads into the market for gas equipment, are competitive among themselves and with the electricity and gas boards, the consumer stands

to benefit overall, not least because the private suppliers appear to enjoy greater freedom than the boards in adjusting their pricings to suit the local market. On the other hand, such benefits as may accrue to him from greater competition among suppliers in general, whether public or private, are apt to be qualified by the circumstance that, once bought and installed, electrical or gas equipment comes to represent a commitment for at least a period of time, usually of years, during which the consumer's freedom of competitive choice—and thus the sanction it confers—is effectively in abeyance. And it is this vulnerability of the once committed that is opening the door to those suppliers who wish to get away with the selling of defective equipment and the avoidance of servicing responsibilities. Whereas the consumer who buys his equipment from an electricity or gas board has behind him the protection and possibility of redress which a consultative council can provide if things go wrong, the consumer who buys equipment from a private supplier is less well placed, even though he undoubtedly benefits from the efforts of several of the trade associations (e.g. the British Electrical and Allied Manufacturers' Association and the Electrical Appliances Association, etc.) directed at raising and upholding the standards of production and retailing of such equipment.

In practice, it generally works out that consumers who have bought equipment from private firms and found it to be defective tend to take their complaints to their local consultative councils, despite the fact that the recognised responsibilities of these councils extend only to the services and facilities provided by their area boards. The councils, for the most part, do what they can to help these complainants; and, as a 'favour', a number of the boards have declared themselves willing to undertake certain repairs on faulty equipment purchased from 'approved' private sources. It is true, of course, that the boards have an interest in the multiplication of private outlets for appliances, even if in competition with their own showrooms, since this helps to enlarge the total demand for the particular fuel they supply; and to this extent, therefore, the 'favours' they do for consumers who have been let down by private suppliers are not wholly divorced from self-interest. None the less, these essentially *ad hoc* arrangements for helping these unprotected consumers are basically unsatisfactory. They do nothing to provide any permanent remedy for this growing area of consumer vulnerability and, if carried too far, amount, in effect, to subsidising the dubious selling practices of at least a minority of private suppliers at the expense of electricity and gas consumers in general. More-

over, redress for the consumer is by no means certain, since the consultative councils have no sanctions in their armoury likely to be effective against private concerns. Most of the councils are in fact becoming concerned at being unable to do as much for these complainants as they would wish. And there is also the possibility of damage to their own public reputations by being put into a position of *seeming* to be ineffective through no fault of their own.

In the present study, however, it is possible to do little more than direct attention to this mounting problem. At most, we can suggest that there now seems to be a real need for some effective arrangements to protect the interests of these vulnerable consumers to be concerted, and perhaps also operated jointly, by the private retailers and contractors, on the one hand, and the electricity and gas industries and their consultative councils, on the other; and that possibly such arrangements might be made more effective if, as a built-in reinforcement, the availability of finance for credit and hire-purchase sales were to be made conditional upon the maintenance of agreed standards of consumer service. For unless something along these or similar lines is attempted, it is difficult to see how consumers in this category can be adequately protected; and it is difficult, too, to see how the consultative councils in the two industries are going to avoid some ill-deserved loss of reputation by being called upon increasingly, to do what they are not fully equipped to do. And for this latter to happen would be to the detriment of all users of gas and electricity.

Possible lines of Development in the Complaints Machinery

Looking to the larger context of the complaints machinery in these two industries, there seem to us to be two basic respects in which there is scope, and possibly need, for further development. One of these is directed at policy-making levels, the other reversely at fuller communication with the consumer. The object of the former would be to bring the consumer interest more influentially to bear on the formulation of policy at higher levels, with a view to removing or reducing some of the more general grounds which give rise to complaints in the first place. The object of the latter would be to develop the public projection and consumer impact of the councils with a view to: bringing to the councils more of those consumers who need help with their complaints but who, knowing nothing of the facilities available, do not at present get it; 'educating' consumers about the local electricity or gas board's charging, servicing and other procedures and about some of the more

relevant limitations (e.g. in regard to supply, finance, etc.) to which it is subject, so as to reduce the number of complaints which arise solely from misunderstanding; and encouraging consumers to bring to the councils their ideas and suggestions for improving the services provided, so as to feed and build up from the 'grass roots' a more articulate and constructive consumers' case for representation at policy-making levels. The first of these two developments, which is an aspect of policy formulation and representation, will be followed up in the next section; the second, in the section following.

Policy Consultation and Representation

It is no part of the responsibility of consultative councils to participate in the actual making of policy decisions in their industry. This is the responsibility, and the responsibility solely, in the electricity and gas industries at the present time, of the area boards (and also of the Central Electricity Generating Board in the case of the electricity industry), subject only to such advice as may come to them from the Electricity Council or the Gas Council, as the case may be, or to any directions from the Minister of Power (or the Secretary of State for Scotland in the case of the two Scottish electricity boards). On the other hand, the making of a policy decision itself comes at the end of a process, often a long process, of policy formulation; and, furthermore, even when made, the decision can still, within limits, be later amended or revoked, if this is shown to be desirable in the light of subsequent experience or events. And it is here, in the 'before' and 'after' of decision-making, that the real policy contribution of the consultative councils in the two industries can be, and indeed in large measure is being, made through the twin processes of consultation and representation. By bringing influence and pressure to bear at one or the other of these two stages, especially at the earlier, the councils can do much to ensure that the consumer interest is well taken care of in matters of policy.

The essence of the distinction between a consultative council's activity in the field of policy and its work on consumer complaints is that, whereas the latter springs for the most part from *particular* consumer interests at issue, the former is central to *general* consumer interests either in the board area or throughout the industry. In practice, of course, the two are inter-related and it is often not possible to draw a line between them. Complaints can, and frequently do, give rise to policy matters and policy matters—especially in regard to tariff rates—provide fertile ground for complaints. Yet the fact remains, perhaps understandably, that the public

image of the councils tends to be characterised, as well as judged, almost exclusively in connection with the handling of complaints. All too little seems to be known about their efforts in the field of policy, where after all lies the most substantial, if largely hidden, element of the consumer's over-all interest; and all too little about how effective has been the development of their impact in this field. In approaching this aspect of the work of the councils, three main questions arise. To what extent do their statutory responsibilities provide for policy consultation and representation? How active are they in fact in policy matters, especially in more major ones at a national level? Is there any undeveloped potential in this field that seems to call for development in the future?

Statutory Provision for Consultation and Representation

Statutory provision in the two industries for the councils to be consulted and to make representations about policy matters is laid down in the relevant nationalisation acts. Under the acts, the councils can consider and report upon matters referred to them by their area boards (and also by the Central Electricity Generating Board in the case of the electricity councils in England and Wales); they are entitled to be informed by, and to make representations to, the area boards about the latter's 'general plans and arrangements for exercising and performing their (the board's) functions'; and, either on their own initiative or as a result of representations made to them by consumers, they may, as has been pointed out already, make representations on any matter affecting the supply of electricity or gas in the area, including the variation of tariffs and the provision of new or improved services and facilities within the area. If the councils wish to pursue any of their representations beyond area board (or Generating Board) level, whether these derive from matters referred to them by the boards or taken up by themselves, the procedures to be followed in each of the two industries are the same as those described in the previous section in respect of complaints.

It is worth noting, however, that, in specifying the 'variation of tariffs' as a matter for inclusion among those about which it is proper for the councils to make representations, the provision appears by implication to exclude any aspect of tariffs *other* than their variation (e.g. their level). This, we suggest, is unnecessarily restrictive and would be better amended for the phrase in question to read 'including tariffs' instead of 'including the variation of tariffs'. It is also significant that any directions which the Minister may give to a board as a result of

representations from a council are, apparently, for 'remedying the defect' only. This would seem to imply a limitation on the purpose of his intervention which suggests that, while ready to respond to a disclosed need to put something right, there is no comparable readiness to consider any case submitted by individual councils for effecting positive improvement. A council's representation, at this level, is narrowed down in fact to no more than a complaint. Consultation with the council is limited to the specific matter of the 'complaint' and must, therefore, appear by implication to be exclusive of matters of national policy. Whether or not it was intended that this should be the interpretation to be put upon the wording in question, it does not, fortunately, appear to have inhibited several of the councils from independently conveying their views on national issues to the Minister from time to time.

Policy Relations with Area Boards

In by far the majority of cases, consultation on policy matters means for individual councils consultation with their respective area boards and representations by the councils means representations to those boards. Any higher representations, with attendant consultation, are generally the outcome of failure to reach satisfactory agreement with the boards or are in respect of some matter, usually of a national character, which lies outside the range of area board decision. The extent to which consultation with boards takes place in the two industries and the responsiveness of boards to representations vary considerably from area to area. Personalities and relationships between personalities inevitably play a large part in this, but so also do the historical patterns of co-operation that have been evolved between councils and boards in their respective areas. Furthermore, the problems of some areas are better suited to such consultation than those to be found in other areas. The establishment of local priorities in regard to a programme of electrification in rural areas is obviously a matter in which a consultative council is likely to be of greater help than in regard to, say, whether or not the board should make a sizeable investment in some new and supposedly more efficient piece of machinery. It is also to be expected that not all of the representations made to the boards by councils will be equally reconcilable with what is practicable.

The prevailing picture to emerge from our own enquiries and discussions was one of relative, in a few cases of close, harmony between councils and their boards and of a general readiness on the part of the latter to be helpful and co-operative. In fact, as was repeatedly pointed out to us, the boards

themselves, in their own interest, are becoming increasingly consumer-oriented. For the most part, they seem to value the consultative councils for the part they are playing in looking after the consumer's interest and keeping it to the fore. In this sort of atmosphere, it is not surprising that the majority—though not all—of the councils report that they are closely consulted by their boards when any important policy move is being considered.

Among the wide variety of policy matters which give rise to consultation between councils and their boards, very many of them stem in the first place, as we saw earlier, from consumers' complaints. But, these apart, perhaps the most persistently recurrent, and certainly the most general in application, relate to changes—usually increases—in tariff rates. Though practices vary, most of the councils are consulted at a fairly early stage by their boards when the case for an increase in tariffs has to be looked into, sometimes in the first instance on a private chairman to chairman basis. To provide a continuing background against which current situations can be assessed, it is the practice in almost every area for the chairman of the board and several of his principal officials to attend a council meeting once a year, usually just after the publication of the board's annual report and accounts, to give a talk to the members of the council (and, in a number of cases, also of its committees) on the board's problems, finances and prospects and to answer questions. When a council is consulted about a proposed increase in tariff rates, the matter may be studied initially by a tariff committee or sub-committee of the council, before being discussed by the council as a whole. Some councils also like to take soundings from their district or local committees. But whatever the procedure adopted, the council viewpoint that is eventually crystallised and conveyed to the board involves either acceptance of the increase in the circumstances, the suggestion of amendments (e.g. as to timing, scale or form) or opposition to it. If the council accepts the increase, it will then, as part of its consultative function, be committed to do what it can, mostly through its local committees, to win over the consumers in its area to a similar acceptance; if it does not, it will represent to the board its case against the increase or for any amendments to it. In the latter event, the practice of most councils in both industries is to do all possible to press their case upon their boards before a decision one way or another has been reached, but to refrain from taking an independent stand against the increase afterwards. Not all of the councils, however, take this line. Several have in fact persisted in their opposition to an increase and have taken the

matter up at a ministerial level. Moreover, they have felt that it was right for them to do so. For, in so far as the case for an increase in the retail tariff derives basically not so much from the board's own cost and revenue structure but from the bulk supply tariff (in the case of the electricity industry) or from an externally imposed requirement as to rate of return on capital assets, then it is evident that the area board itself has little room for manoeuvre in the matter and that the real target for any representations which the council may wish to make is to be found at a higher level. Moreover, in these circumstances, a council's persistence in its opposition to the increase is, in a sense, of advantage to its area board as well as to consumers; it is tantamount to an independently exercised counter-pressure against outside factors bearing on the board's finances but over which the board itself has little or no control.

A few of the councils, including one electricity and three gas councils, did in fact complain that they were inadequately consulted by their boards over policy matters, in particular when tariff increases were being considered. In one instance, it appeared that the council was not consulted at all, but merely presented with what was virtually a decision that had already been taken and invited to give its comments; in two others, not enough time was allowed for the councils to study and comment usefully on the tariff increases proposed. According to one gas council, the tendency of the board was to inform it about proposals rather than consult it about them. On the other hand, one electricity council chairman said that he preferred not to be consulted about an increase until a definite proposal by the board had been made, so as to reserve his council's position to take such steps as were thought appropriate afterwards. This state of affairs, in so far as it does exist, appears to us to be less than satisfactory—in the interests of the board as well as of the council and the consumers. Whatever the historical reasons which may lie behind such lack of consultation we feel that it is up to the councils concerned to raise it as an issue with their boards and, failing a satisfactory response, to seek a ministerial directive in the matter. Otherwise, they are being prevented from serving consumers to the full extent of which they are capable.

So far, however, as we were able to judge from our discussions and from a study of council annual reports, consultation between councils and their boards is, apart from the few exceptions referred to above, on a sound and mutually co-operative basis throughout both the electricity and the gas industries. As to whether, in sum, the influence of the councils on board policies, either as a result of prior consult-

ation or through subsequent pressure for needed changes, is on the increase or not, it is difficult to assess with any approach to objectivity. The impression we have formed, however, is that it is. And we would certainly hold that it is desirable that it should be.

Consultation at a National Level

The policy impact of the councils above area board level is necessarily on a much more limited scale. Apart from specific issues arising mostly out of consumer complaints and over local retail tariff increases, the ones which call for a higher level approach are those issues common to all or most councils. Of these, the main ones have been the bulk supply tariff for electricity, the fuel oil tax, selective price increases in coal and the self-financing obligations—all of which have been the subject of higher than board level representations by individual councils during the past few years. With the possible exception of the first, which is essentially a problem for the industry itself, these are matters of Government policy as they bear on the electricity and gas industries and their respective consumers. It follows, therefore, that any representations advanced by consultative councils in regard to these matters need to be on collective lines if any effective and useful impact is to be made in the right quarters.

Such arrangements as at present exist for concerning the viewpoints of the councils in each industry and for the making of any collective representations are both limited and essentially informal in character. In neither industry is there any statutory consultative body at the centre. In the electricity industry, the chairman of the twelve consultative councils in England and Wales meet twice a year in London, on one occasion to have discussions with the Electricity Council and on the other occasion with the Minister of Power and some of his officials. During the evening prior to each of these occasions, the chairmen all meet privately for a discussion, which affords opportunity for arriving at any collective viewpoints they may wish to press. In the gas industry, the twelve chairmen meet only once a year, this being for a discussion with the Minister and some of his officials. They have no meeting with the Gas Council and they do not meet privately, as do the electricity council chairmen, for a discussion among themselves. Over and above these regular meeting arrangements in London, there are no standing arrangements for making collective representations on the consumers' behalf in respect of matters of national policy. At most, the chairmen in either industry can, if they so wish, arrange a special meet-

ing together, additional to the regular ones, when some matter of sufficient importance arises.

Recent annual reports of the gas councils tell nothing of the subjects of discussion at the annual meetings of their chairmen with the Minister of Power. The reports of several of the electricity councils, however, are more informative. At recent meetings which the electricity council chairmen have had with the Electricity Council, the main subjects of discussion have been concerned with the resale price of electricity, connection charges to new housing, prospects for the supply industry, consumer research and the bulk supply tariff. At their meetings with the Minister, the subjects have included publicity for the councils, the resale price of electricity, the fixing of tariff charges and the financial obligations of the industry. Of these, two in particular bear fundamentally both on the position of the councils and on the general interests of consumers. One of these is the bulk supply tariff; the other, the financial obligations of the industry.

Since the bulk supply tariff accounts for something like 75 per cent of the costs of the seven electricity boards in England and Wales, and variations in it therefore very soon lead to similar variations in the area retail tariffs charged to consumers, it is a subject of key importance to electricity consumers in general. Yet it is one in regard to which the electricity councils (in England and Wales) appear to be effectively excluded from any useful form of consultation, even though several councils appear to have good liaison with local officials of the Central Electricity Generating Board. It is true that, since the Electricity Act of 1957, provision has existed for the Central Electricity Generating Board to refer matters relating to variations in the bulk supply tariff to consultative councils for their views and for the councils, after consultation with their area boards, to notify the Generating Board of their conclusion. So far as we have been able to discover, however, no such reference by the Board to any of the electricity councils has yet been made and, although one council at least has itself made representations to the Board in connection with the regional incidence of the fuel oil tax on the bulk rate and one or two others have protested to it against increases in the bulk rate, this provision under the Act remains, for all practical purposes, a dead letter. As a result, decisions closely affecting the price consumers have to pay for their electricity are in fact being taken and announced without prior consultation with the consultative councils and apparently in complete disregard for any views they may have. A number of the councils are understandably concerned at this situation and several protests against this seeming detachment of

the Generating Board from direct contact with the consumer interest have been made in recent years to the Electricity Council and to the Minister of Power, but without effect. Suggestions that the consultative councils should be represented by one of their chairmen on the Electricity Council, so as to be able to speak for the consumer interest when the bulk supply tariff comes under review, have also met with no response—not least perhaps because it might be difficult for any one council chairman to speak for all areas. It is frequently argued against any change in the present practice that the problems associated with the computation of a bulk supply tariff are so highly complex that consultation with a lay body, such as a consultative council in, could serve no useful purpose. With neither greater force, it is also argued that, since the chairmen of the electricity area boards are themselves members of the Electricity Council, they can be relied upon, in the interests of their own board finances, to resist any 'unnecessary' increases in the bulk rate. In our view, however, the position cannot be regarded as satisfactory. If the electricity consultative councils are to be excluded from a consultative voice in so major an area of general consumer concern, then, no matter how effective they may be in dealing with the many essentially local and more specific matters that come their way, they cannot possibly develop their full potential of service to the electricity consumer.

The financial obligations imposed on the electricity and gas industries as a result of the 1961 White Paper on 'The Financial and Economic Obligations of the Nationalised Industries' (Cmd. 1337) are even more fundamental to the interests of all consumers of the products and services those industries provide. In the case of electricity, the industry is obligated to achieve a gross return on average net assets for the quinquennium 1962-67 of not less than 12.4 per cent; in the case of gas, the target rate for the same period is slightly lower at 10.2 per cent. Clearly, if these rates of return are to be reached, then any increases in the industry's costs over the period, which cannot be avoided or absorbed, have to be paid for ultimately by the consumer in the form of higher tariffs. And this is what has been happening in both industries, in view of the fact that the period in question has been one of rising costs generally. That tariff increases have not been the same in all board areas has been due largely to differences of input locality of certain cost factors, in particular rising coal prices.

As we have seen, the consultative councils look thoroughly into the reasons behind all proposals for retail tariff increases in their respective areas and very often do what they can to resist the increases by

making representations against them to higher authority. A few of them, too, have independently protested to the Minister against the Government's financial requirements which have helped to make the tariff increases unavoidable. It was not, however, until 1965 that any protest by the consultative councils against the growing burden of these requirements on the present generation of consumers was made on a collective basis—a condition which would appear to be essential if the consumers' case is to be sufficiently representative nationally and to receive the consideration it merits. In that year, with the unanimous support of the other electricity council chairmen, the Chairman of the Southern Electricity Consultative Council (who was the convening chairman for the year) addressed a letter to the Minister of Power, urging that the industry should be relieved of the inclusion of work in progress and of plant not yet in operation in the net assets upon which the required rate of return has to be based; that the rate of return, at present higher for the electricity than the gas industry, should cease to be discriminatory as between the two industries; that the Generating Board should be relieved of the heavy burden of the fuel oil tax; and that the basis of cost sharing as between the taxpayer and the Generating Board (which means, in effect, through the operation of the bulk supply and retail tariffs, largely the consumer) for the development of nuclear power for generation should be re-considered. Whatever the outcome of this representation (which will not be known until the financial objectives for the next quinquennium have been decided upon and made public), the fact that such a representation has been made on a collectively sponsored basis amounts, in our view, to a major step forward by the consultative councils in the electricity industry in developing their fuller potential of service to the industry's consumers. It is a move which we should like to see followed by other such moves—and by the gas consultative councils as well as by the electricity ones—when issues arise, whether in connection with the industry's own policy or with the Government's policy in respect of the industry, which seem to the councils to carry a nation-wide threat to, or entail an undue burden upon, the generality of consumers.

Adequacy of Existing Arrangements

If the councils in the two industries are to develop this collective aspect of their activities on the consumer's behalf, so as to enhance their effectiveness at a national level, the question arises as to whether the existing arrangements, which have no statutory standing, for twice yearly meetings of the electricity council chairmen and once-yearly meetings of the

gas council chairmen are adequate for the purpose. When asked for their views, most of the chairmen thought that they were. Several of the gas council chairmen, however, felt that their own industry's arrangements might with advantage be extended to include an annual meeting with the Gas Council, in addition to that with the Minister, and also private meetings among themselves. These would both seem to us to be developments in the right direction. They would enable national policy matters to be more effectively discussed and would establish regular contact between the industry's consultative councils and the Gas Council, such as does not exist at present. But to any suggestion that there might be a case for setting up some more formalised machinery at the centre for each industry's group of councils, such as perhaps a central committee or council, there was, aside from one or two exceptions, almost universal disapprobation. Among the reasons given were that it would involve tackling consumer problems at too great a remove from the consumer; that there would be too few occasions on which there was a sufficiently full agenda of 'national' items; and that an unnecessary expenditure of time and money would be involved, especially for those chairmen coming from more distant parts, in travelling to and from London for what would presumably need to be fairly regular (i.e. at least quarterly) meetings. There was also, it seemed, at the back of this general attitude, an unvoiced reluctance to accept that another body should intervene between the councils and the Minister and, in a greater or lesser degree, detract from the autonomy they at present enjoy.

In our discussions, we also raised the question as to whether or not there was a case for the setting up of a small central, but independent, research and briefing organisation for each industry to service the needs of individual councils, and also of the councils collectively, when they had matters of policy to raise which required prior documentation and briefing. This suggestion met with only qualified favour. Several of the chairmen did, however, think that there might be some merit in the idea, since issues did arise from time to time, particularly in regard to finance when a proposed tariff increase was under scrutiny, which called for specialised study and assessment by someone or some body separate from, and independent of, the industry's own staff facilities. In making this point they emphasised that this was in no way prompted by disregard for the ability or readiness to co-operate of board officials, most of whom were only too ready to help, but by the need for the councils, as independent bodies, to have access to independent sources of expertise. Their only doubt

was whether there would in practice be sufficient work of this nature to support such an organisation on a full time basis, even if it were only on a modest scale. Though it is impossible for us to judge with any objectivity on this last point, we find it difficult to believe that this would in fact prove to be the case and suspect that there may already exist sufficient work which, in the absence of any such facility, has now to go largely by default. We will, however, be returning to this suggestion later.

The view to which we ourselves have come is that it is at this national level of policy consultation and representation that one of the two major weaknesses—the other being the inadequacy of impact at the consumer level—of the existing consultative machinery in the two industries is to be found. The meetings of chairmen (and also secretaries) of councils, valuable as these undoubtedly are, do not of themselves seem to us to make up for what is unquestionably a lack in the machinery at this level. In the past, this may not have seemed to matter overmuch or to have left the consumer in any discernible sense deprived. But, today, with nationally framed policies acquiring an ever greater ascendancy over local ones, new challenges are confronting the overall consumer interest in these industries and seem to us to call for a new assessment of the rôle of the consultative councils on the national plane and for a more effective exercise of their collective influence. Devised and set up as the machinery was some twenty years ago, it would be surprising if, in a milieu of change, there were to arise no need for adaptation and development in at least some aspects of its functioning.

A suggestion that we ourselves have to offer in this connection will be put forward and developed in the final section of this chapter.

Public Awareness of the Consultative Councils

One of the two major conclusions which emerged from our field survey was how very limited is the extent to which the general public is aware of the existence of the consultative bodies—12 per cent only of the sample being aware of the electricity councils and 12 per cent of the gas councils. Knowledge of the actual functions of the councils and of the work they are doing on the consumers' behalf must, therefore, be more limited still.

That the general public should be so little aware of the existence and work of the consultative councils in the electricity and gas industries is not really surprising. It is, after all, in the nature of things that, in general, consumers will only make efforts to

discover, or will only react to notices about, such bodies when they have some fault to find or something to complain about. And these instances tend to add up for the generality of consumers to a very small percentage indeed of the total of transactions satisfactorily carried out by the boards of the industries in question. In this particular sense, public awareness of the councils can, in effect, be regarded as an obverse reflection of the efficiency of the industries themselves—a consideration which must serve to qualify any facile inclination to relate the effectiveness of a council exclusively to the number of complaints it receives. Another reason why the councils are so little known about is that almost all of their work is of a kind which does not provide public drama and, in general, only little in the way of 'news stories'. It is done quietly in the background, dealing with the complaints of individual consumers or bringing persuasion to bear upon area boards, only occasionally breaking out into publicly taken stands on some issue or other. It is not a source of ready material for easy publicity. And, again, it is becoming increasingly difficult today, as councils and committees of one sort or another proliferate, for them to be readily identifiable by those whom they exist to serve, more especially if the name by which they are known gives no clue to their purpose. The decision not to include the word 'consumer' in the name of the consultative councils may, at least at the time, have seemed well-grounded; it is more questionable now as to whether this is still the case. And so far as the district or local committees of the councils are concerned, the omission of any reference to the consumer in their title, when their rôle is, unlike that of the councils, essentially that of a consumer, rather than a consultative body, cannot, we feel sure, be without its effect in contributing to their relative anonymity.

Despite these concessive arguments, however, there does seem to be a real need for the consuming public to become more knowledgeable about the consultative machinery in these industries and about the services it can and does provide. And this view is shared by most, if not all, of the councils themselves and, it is believed, also by the Minister. The problem is how best to achieve it. There can be no justification, of course, for the sort of publicity campaign which sets out to boost the services of the councils by impliedly denigrating the efficiency of the industry and suggesting, artificially, that there is much that consumers need to complain about. Nor are advertisements or more flamboyant publicity gimmicks likely to provide the answer. Quite apart from the expense of such recourses, all they usually

achieve is to add only marginally to those who come to the councils with genuine complaints. Moreover, campaigns of such a nature need to be repeated at fairly frequent intervals if any momentum they may generate is to be sustained. This has been the experience of several of the councils in the case of leaflet distributions. When, for example, the London Electricity Consultative Council circulated a publicity leaflet to some 1.5 million consumers in London in 1962, the immediate effect was to boost the total of complaints which reached the Council during the year 1962-63 from an average figure of something over 300 to one of 945. In the year following, the number was down again to 322 and has been of that order ever since. Clearly, a more lasting development of the public's knowledge of the councils has, in the main, to rely on methods which, while less immediately productive of results, are more consistently applied, together with such 'windfall' assistance as accumulates, over the years, from a word-of-mouth spread of reputation by satisfied consumers. The aim must be to get regular publicity whenever possible for what the councils can do for the consumer in their industry, what they are currently doing and what they have been doing. This is broadly how the publicity activities of the councils in the two industries have been developed. The choice of methods has varied and so has the overall effectiveness. But the general pattern is similar for all councils.

Present Publicity Measures of Councils

The publicity activities of the councils fall roughly under three main headings. There are those which seek to convey a fairly constant content, like posters or notices, leaflets, advertisements and insertions in handbooks; those which deal with current events or topical issues with which the councils are involved or which entail some feature presentations in the form of articles or talks; and annual reports.

Almost all of the councils in both of the industries have posters displayed in board showrooms and service centres. Most, but not all, of these give the names, addresses and telephone numbers of the secretaries and some also the names and addresses of the chairmen and members of the council and the committees. These, or similar, posters are also widely distributed for display to local authorities, including town halls and libraries, citizens' advice bureaux, parish halls, local chambers of trade and commerce, agricultural bodies, various women's organisations and sometimes local members of parliament. More recently, a gas council has, with some success, distributed notices to local industrialists for display on works notice boards. Most coun-

cils, too, have produced explanatory leaflets, some for collection by consumers from board showrooms, some for distribution to such bodies as above and, in a few cases, for distribution to all consumers in the area. One or two councils have had advertisements published in a range of local papers; others have arranged for insertions in various directories and handbooks, such as telephone directories, tenants handbooks and the like. Notices about the councils also appear on the accounts of many of the area boards and on lists of local organisations exhibited in post offices.

Publicity for the current activities of councils centres around their periodical meetings and around particular issues in connection with which public interest has been stirred and a council has become involved. So far as the meetings are concerned, it is usual for the press to be invited to be present—though not at the meetings of district or local committees, which are held in private. Some of the councils provide the press with prepared releases, in addition to agendas, covering the subjects under discussion. A number of them hold some of their meetings in different local committee areas, with local dignitaries in attendance. At least two councils hold annual press conferences to coincide with the publication of their annual reports. Occasional letters to the press and the publication of occasional feature articles on the work of the councils provide further publicity outlets. One or two council chairmen have appeared on television, generally in connection with debates over impending tariff increases, and brief items about the councils are sometimes included in television news reports. A number of the chairmen and secretaries, and also some of the members, give talks about their councils to a variety of audiences.

But the most substantial, if not perhaps the most widely read, public presentation of a council's work is its annual report. This report is prepared and submitted annually to its area board by each electricity and gas consultative council as a statutory requirement; and it is then included in the report which the board itself submits to the Minister for presentation to parliament. Some of these reports are very good indeed in content and contain a wealth of authentic fact about the council's work during the year under review, providing the only official published source from which can be learned how diversely applied have been the council's efforts in looking after the consumers' interests. Others, however, are more abbreviated in their treatment and give prominence only to the recording of more formal matters, such as meetings held, changes in appointments and membership lists. Since the reports are made as

submissions to the area boards, they have to appear in published form as part of the boards' own reports and, in consequence, tend to be all but lost in the larger publications. For this reason, all but a very few of the councils now arrange for a large run-off of their reports to be separately printed for independent distribution to the national and local press, the technical press, local authorities, local members of parliament, chambers of trade and commerce, trade unions, women's organisations and a variety of other bodies.

To provide a detailed example of a current publicity programme of one of the more publicity-conscious of the gas councils, that of the Eastern Gas Consultative Council is set out in full in Appendix IV(I).

Possible Developments in Publicity

In spite of these efforts by the councils to win publicity, there is none the less need for something further to be done if a more satisfactory level of public awareness of the councils is to be achieved. There are a number of possible lines of publicity development which seem to us to hold some promise and these are set out below.

Of the more immediate steps that might be taken, two concern the development of already existing practices. One of these, which it is believed has not yet been exploited by more than one or two councils, involves seeking the agreement of industrialists in a council's area to the display on works notice boards of notices about the council and its services. To the extent that the industrialists responded—and in one gas council area the response has been good—the notices would then have a chance of being read by a large number of employees who themselves would rarely, if ever, enter a local authority office or a citizens' advice bureau. Another and more widely adopted practice, which we consider might with advantage be extended, is that of giving talks and lectures to an increasing range of audiences and the promotion of discussions, and perhaps occasionally seminars, with the twin objectives of educating consumers in the use of the councils and of encouraging them to put forward constructive ideas and suggestions. The practical difficulties here are, of course, the availability of enough time for council chairmen, secretaries and others to give the talks and also the availability of enough worthwhile audiences. Several of the councils are, we know, already very active in this way; but, in general, we get the impression that this is as yet a still underdeveloped publicity and consumer education market. Annual press conferences, such as at least two councils already hold, preferably to coincide with the publication of

council annual reports, are another useful way of winning local press interest, more especially if some hospitality is included as part of the function. These, moreover could be arranged, we would think, without much difficulty by most, if not all, of the councils. A further suggestion, which is at present being canvassed by certain councils, is that a short film should be made about the councils and the way they work for wide showing throughout the country. This appears to us to be a very promising idea and one which we should like to see go forward.

There are, however, several further developments which we believe to be desirable both in themselves and in order to enhance public awareness of the councils. These relate to the annual reports of the councils, liaison with members of parliament in council areas, the publicity angle to collective action by the councils and the identifiability locally of the district or local committees of the councils.

There is, we feel, scope for capitalising more than seems to be done at present on the publicity value of council annual reports. Certainly, in our view, every council should have a printing and distribution of its reports quite separate from their printing and distribution as part of the area board reports. In fact, we would question the very principle under which the reports are submitted to, and published by, the boards in the first place, conveying, as it does, the implication that the councils are responsible to, and mere dependents of, the boards, instead of being, as they rightly are, independent bodies set up by the Minister under acts of parliament. It would be, in our view, more appropriate in the circumstances, and better for the public image of the councils, if their reports were to be submitted direct to the Minister and to be published quite separately. But, even under the present less than satisfactory arrangement, there is no reason why the reports, with the expenditure of a little more money, should not be made more appealing to the reader. At present, they all have the appearance of 'off prints', being printed and set out in a way that hallmarks them as the extractions they are from more substantial parent publications. Having regard to the valuable material which most of them have to record about the council's work in connection with a variety of matters of concern to consumers, there would appear to be a very strong case for a development of this aspect of the reports and for their presentation in a more attractive way, within more enticing cover pages, leaving the formal items to be dealt with briefly or relegated to appendices. Moreover, as is already done, for example, by the South Western Electricity Consultative Council and the East Midlands Gas Consultative Council, the

publication of the reports could be used as an appropriate occasion for the holding of annual press conferences by the councils.

Liaison with members of parliament having constituencies in their respective areas is, we suggest, of great—in fact, of growing—importance to the electricity and gas consultative councils. Many of the councils are alive to this and most of them distribute their annual reports and other council literature to these local members of parliament. Even so, we suspect that the latter are, in general, too little briefed about the role and work of the councils and that there is much less direct liaison between them and the councils than would seem to us to be desirable. As a result, when, as often happens, a disgruntled consumer takes his complaint direct to his member of parliament, the latter tends to refer the matter direct to the Minister, who in turn, generally takes it up as necessary with the appropriate area board. Thus the consultative council is effectively short-circuited and ignored. This is of little help to its public image and often of little help, too, to the consumer. It involves a wasteful disregard of the council's knowledge and experience of local consumer problems, whether of electricity or gas, and of the fact that the council has been set up by parliament specifically to serve one or the other of these particular consumer interests. If the matter of the complaint is one which the council has itself already investigated but has been unable to do anything about, it is perfectly right for the consumer, if still dissatisfied, to take his complaint to his local member of parliament. But before taking the matter up with the Minister, the member of parliament should, we consider, as a matter of established practice, seek the comments of the consultative council in question as a background to his further action. If, on the other hand, the complaint is one which has not been processed through the available consultative channels, then the member of parliament should, we hold, first refer it to the consultative council (and not to the Minister or the chairman of the area board) for action and notify the complainant that he has done so. If, in the event, the council is unable to satisfy the complainant, then it becomes appropriate for the member of parliament, having studied the council's comments, to take whatever further action he may deem desirable. This procedure—and we feel that the Minister could help by recommending to members of parliament the desirability of their following it—would not only help to ensure against the councils being by-passed but would, in the end, prove to be of greater service to the consumer. In urging the case for closer liaison between the councils and local members of parlia-

ment, we have in mind, over and above the question of publicity, the fact that members of parliament have themselves a concern for the consumer, not less than the other interests of their constituents—a circumstance which suggests that there should be fertile common ground upon which effective co-operation between them and the councils could be developed to the electricity and gas consumers' advantage. It seems to us, therefore, of first importance that every effort should be made by the councils to establish personal contacts with, and for their chairmen and secretaries to become known to, all members of parliament in their respective areas. Each council would, of course, need to work out its own particular ways of doing this, not least because problems of communication are not everywhere the same; but there would seem to be some case for occasional functions, linked to some hospitality, with this objective in view.

When we were discussing policy consultation and representation in the previous section, we came to the conclusion that there was need for the collective views of the consultative councils to be given more effective voice at a national level when issues of national import were at stake. In so far as this were to come about, an entirely new field for effective publicity, national as well as local, would be opened up; and one which, if fully exploited, could add significantly to the impact of the councils on public awareness. Hitherto, the work of the councils has been essentially on an individual and local basis and its public impact has necessarily been mainly local. But, with the councils coming to voice their views collectively on national issues as they affected consumers in the two industries, and with it becoming known that their views on these issues were being sought by the authorities, then a new breakthrough in communications between the councils and the public could well become possible.

Finally, there is the point we referred to earlier of the identifiability of the councils by the consuming public and, even more so, that of their local committees. While we ourselves would prefer to see the word 'consumer' introduced into the name of the consultative councils, so that they became known as (which in practice they are) 'consumer consultative councils', we realise that there will have grown up over the years an understandable resistance to any such change, even though more painful than in the past such a change has now become. In the case of the local committees of the councils, however, which are in fact consumer, and only very marginally consultative, committees, the case for making them readily identifiable as such by name seems to us to be a prior requirement of more effective local public

overcome. What is more, the closest exclusive concern of the councillors of both the electricity and gas consultative councils with consumer complaints is their location, and their closeness of contact with the consumers themselves, suggest that, unlike the councils, the consumer concern interest which the two groups of councillors share must tend to overshadow as important the difference in industrial content between the various nature of complaints they handle. And, in so far as this is so, not only does it add strength to the case for the inclusion of the word 'consumer' in the designation of them both but opens up possibilities of joint activity, based on that shared local consumer interest, to secure more widespread public recognition, joint activity towards greater publicity by electricity and gas committees operating in the same locality is no doubt a firm and most obvious move in this direction; others, such as shared offices and occasional meetings, would seem to follow. We shall, however, be coming back to this point in the next section.

Finance for Publicity

The financial resources available to the consultative councils in the two industries for publicity purposes have been, as we indicated, generally adequate. Moreover, when a council has wished to spend an additional amount on publicity above its normal provision, generally to despatch a leaflet distribution or some other special promotional measure, the extra amount required has been made available without difficulty.

For possible publicity activities to be further developed, whether along such lines as we have suggested above or on other lines, additional allowances will clearly be necessary, some of them perhaps substantial. Since, however, promoting publicity, at least in the councils themselves, has come to accept that the public's knowledge of the consultative machinery in these industries is much less than it should be, and the findings of our field survey have pointed in the same direction, there would appear to be a strong case for such allowances to be made available from central sources—for this is a national, and not just a local, matter. Moreover, whatever the further developments in publicity spread upon, they will no doubt need to include some which are collectively sponsored (e.g. a film) as well as those which depend upon the interests of individual councils.

In so far as joint publicity or other joint moves come to be developed by electricity and gas committees operating in the same locality, there would, of course, be achieved a saving or more. To this extent, development along these lines could be offset

in financial terms against the increased costs of such publicity developments as those discussed above.

Two Suggested Developments

A number of suggestions for improving and strengthening the consultative machinery in the two industries, some of them more important than others, some more tentative than others, have been put forward, as concerns for them has arisen, in the course of the previous sections of this chapter. There are, however, two further—and major—areas of the course of the previous sections of this chapter. These are, however, two further—and major—areas of a more fundamental nature that we have now to advance. Both of them relate to levels at which, according to our findings, the consultative machinery in these industries seems to be least effective—the level of the consumer front, at which contact is still limited and impact still small, and the national level, at which the consumer's voice is still too muted.

A Way to Improved Local Effectiveness

Towards the end of the previous section, when suggesting possible ways of improving public awareness of the electricity and gas consultative machinery, we expressed the view that one of the main handicaps was that the local (or district) committees of the consultative councils were not readily identifiable as such to consumers generally. We suggested that, since the primary concern of the councils was to deal with consumer complaints and not with matters of policy, they were really 'consumer committees'; and, being so, it would help them to become better known if there were to be some reference to the fact in their title. We also suggested that, as the consultation was, in effect, down to the consumer and his complaints close to the industry and its policies, there seemed to be possibilities open for the development of joint activities by the electricity and gas committees in the form of similar geographical areas.

We should now like to make this latter suggestion further and to put forward the view that the fact has come for consideration to be given to the gradual replacement of the local electricity and gas committees by local joint local committees covering shared areas of electricity and gas consumers, such such consumers being of roughly the same size as one of the present committees but with at least a third, and possibly more, of the members on it representing each of the two categories of consumers. As now, the electricity representative council, we suggest, be superseded by, and financed through, the local electricity consultative council, and the gas representative appointed by, and financed through, the corresponding gas consultative council. As such, they would still be responsible to their respective parent consultative councils for looking after the

interests of their local consumers in respect of matters specific to their industry and would be expected, too, to give confidential treatment to any confidential matters referred to them by their councils. Also, as now, complaints about electricity would be handled by the electricity representatives on the committees and, as necessary, referred by them to their parent consultative councils; and gas complaints would be handled by the gas representatives and, as necessary, referred to their consultative councils. Furthermore, we would suggest—though we will be referring to it again in the next chapter—that these committees should also have on them as members several representatives of the solid fuel consumers in the area to deal with, and advise the consumers about, problems and complaints arising in connection with the local supply of solid fuels. The joint committees would then be equipped to look after the consumers of *all three* fuel industries. Meanwhile, over and above the specific electricity, gas and solid fuel issues needing separate handling, the three groups of representatives would have the opportunity of discussing jointly the fuel problems of their local consumers in more general terms, especially where these were common or complementary, rather than competitive, in character; and also of making assessments of the overall fuel situation in their areas from which useful ideas and a build-up of local information could well arise that it should be possible to turn to account at a higher level. As we suggested in the previous section, joint activity in regard to publicity would be particularly appropriate as a first move towards evolving these joint committees; so, too, as a next step, would be shared offices, which would assist local identification, and shared secretarial staff and equipment, which would reduce overheads. The cost of setting up and maintaining adequate offices for the joint committees and of providing independent secretaries and the necessary staff should, we suggest, be a charge against the Ministry and not the fuel industries. We would also suggest that, if such joint committees came to be formed, they should be given a readily recognisable and descriptive name—being called perhaps 'Local Fuel Consumers Committees'.

We realise, of course, that a move towards merging, or at least partly merging, the identities of local electricity and gas committees into joint fuel committees is one that is unlikely to be welcome to their parent consultative councils. And this is understandable, the present system being one of twenty years standing and one that, within its limits, seems to be working quite well. But it does seem to us that something more is now needed at this local level: that in fact there should be a single fuel consumers'

committee for each local area, which should be easily identifiable and located, to which all local (nationalised) fuel consumers (whether of electricity, gas or coal) could take their problems, complaints or suggestions either to be dealt with locally or, if that were not possible, to be passed on to appropriate higher levels. And this is something that is simply not provided by existing arrangements. It is only, we believe, by means of such a development that the consumer end of the consultative machinery in the fuel industries can make its full and proper contact with, and impact upon, the local consumer front; and, at the same time, be geared to take account of both common and complementary fuel problems in the area, in addition to those of a more competitive nature specific to each industry.

There is, however, a further consideration leading us to advance this suggested development. This is the likelihood, to which we have already drawn attention earlier in the chapter, of the supply of suitable candidates for voluntary service on the already numerous councils and committees beginning to fall behind the growing demand, as more and more such bodies making calls on voluntary service come into being. Already, we understand, this problem is beginning to press in certain areas, but it does not seem as yet to have become a general one—in fact, in one or two areas a contrary trend is in evidence. But that it will become a significant factor before very long seems only too likely; so that any move towards economising on the demand for such voluntary manpower by a reduction in the number of committees must in the larger and longer-term context have much to commend it. Merely to disregard the possibility is to countenance drift into a situation in which either the manning of the committees on present-day scales will become increasingly difficult or it will become necessary to accept lower standards for appointment—in either event to the detriment of consumers.

On the other hand, if the case for such a system of joint committees came to be accepted, it is clear that no hurried or 'across the board' implementation of it would be practicable. The problems and characteristics of the different council areas, as we have seen, are so very varied; and this is equally true of their local committees. Not least of the difficulties to be overcome is the fact that the area boundaries neither of the electricity and gas consultative councils nor of their respective committees coincide, though, apart from a few instances, there is a large degree of overlap. The demarcation of joint committee boundaries would, therefore, be a formidable—but by no means insuperable—task and one that would no doubt have to be tackled piecemeal, area

by area. Indeed, such a pragmatic approach to the change as a whole would, it seems to us, once the desirability of it had been accepted as an objective and a finite term of years (say, not more than five, but preferably three) laid down for its completion, be the only realistic way of introducing it, if the circumstances peculiar to each area were to be taken into account and the adaptation achieved with the least disruption of the existing nexus of co-operative working. Essentially, in fact, it would be a task largely for the individual electricity and gas consultative councils themselves to carry out together in their different areas, subject to whatever broad directives were laid down.

If the joint committees were to be developed along the lines we have broadly suggested in the previous paragraphs, it would mean, so far as members of the existing committees were concerned, that, although, as electricity or gas contingents on the joint committees, they would be fewer in numbers than now, their position in relation to their respective consultative councils and the scope and character of that portion of their work (which would still be the bulk of it) concerned with their respective industries would remain substantially unchanged. In consequence of the change, therefore, they would have lost little that was vital. On the other hand, there would be several gains. They would all come to participate in joint committee discussions when more general or overlapping consumer fuel problems were under consideration; they would share the joint administrative facilities provided, such as offices, staff, publicity and the like; and they would come to have joint and publicly recognisable consumer identities and well-known locations, which should enhance their overall consumer contact and thus the overall service they were able to give to fuel consumers in their areas.

Towards a More Effective National Role

The other of the two major suggestions which we have to put forward follows from the conclusion we reached at the end of the section dealing with policy consultation and representation—namely, that the machinery for the consumer to be consulted and represented at a national level is no longer adequate in view of the increasingly national character of policies and decisions of key concern to consumers in these two industries. In putting forward our suggestion as a possible means of offsetting this weakness in the machinery, we have taken account of the fact that most council chairmen do not seem to favour the setting up of central consultative bodies, whether in the electricity industry or in the gas industry. Though we ourselves incline to the

view that this may have to come sooner or later, we have confined our present suggestion to what is really a compromise provision, which, if adopted, could, we believe, do much to improve the effectiveness of the machinery nationally, but without in any way detracting from the independence of the existing electricity and gas consultative councils. What is more, if it later turned out that central consultative bodies for the two industries did need to be established, then the provision itself would have filled a useful interim role which should make easier any further steps that needed to be taken.

What, therefore, we suggest here is that there should be appointed a part-time consumer member to the Electricity Council and a part-time consumer member to the Gas Council, each such member to concern himself specifically with the consumer aspect of his respective Council's work and policy. The object of these appointments would be to provide, in each case, a more effective and more permanent channel than at present exists for the representation of the collective viewpoints of the electricity and gas consultative councils at a national level and a focal point at that level for dealing with national issues of import to the consumers concerned. It would be essential for this that the persons appointed should be completely independent of the individual consultative councils in their respective industries, yet at the same time have the closest possible liaison with them. They would therefore need to spend a fair amount of time travelling around the country, having discussions with council chairmen and attending council meetings, in order to keep in touch with the whole national consumer picture and its local variations and also to help the councils themselves keep in touch with the national problems of the industry and with the thinking about them at the national level. Moreover, in addition to being able to put forward collective viewpoints on behalf of the councils in their industry, they should each be quite free to form and give expression to independent viewpoints of their own. They would need, too, to have the right of direct access to the Minister, both in order to help brief him on the consumer aspect of their industry and in order to refer to him any issues, should these arise, on which the consumer interest was irreconcilably in dispute at lower levels.

It is important to emphasise that these national consumer appointments, if they were to be made, should not be construed as infringing the present autonomy of the consultative councils in the two industries or as interfering with the councils' own channels of approach to the Minister. In fact, the appointments could help the councils in a number of ways, over and above those which should follow

from the role outlined above. One of these might be for the consumer members appointed to be responsible for convening the meetings of the consultative council chairmen in their industries with the Electricity Council or the Gas Council (if meetings with the latter came to be arranged) and with the Minister, since they themselves would no doubt have an active part to play at these meetings. Another way in which they might help could develop from the fact that they would become the most appropriate—though not necessarily the exclusive—channels through which to process complaints which were being referred to a higher than area board level. Whether the complaints came from consultative councils on behalf of consumers or direct from consumers in the event of their consultative councils being unable to help them, the consumer members would be especially well placed to take up the complaints on the consumers' behalf either with their Councils or with the Minister, as necessary. On the other hand, if individual consultative councils wished to exercise their own existing right to refer complaints to the Minister, they could, of course, still do so.

To carry out their duties effectively, however, the consumer members of the two Councils would need access to the services of at least a small, but quite independent and expert, staff, able both to cope with such administrative work as was involved and, more particularly, to undertake necessary research and provide authoritative and well-documented briefs. We referred earlier to a suggestion that there might be a case for a central research staff to be set up in each industry to service the individual and collective needs of its consultative councils, but pointed out that there seemed to be little enthusiasm for the idea among the councils themselves. Given the appointment, however, of consumer members to the Electricity and Gas Councils, each with a need for the services of an expert staff, then the case for some such provision becomes very much strengthened. If, therefore, such central research staffs were to be set up, as we believe that they should be, we suggest that each should be under the control and direction of the consumer member on its industry's Council and that its services should be available not only to that member but also, on request, to the consultative councils in the industry, either individually or collectively. It would be of the essence of such a staff that it should be independent of the industry, so that its findings and briefings could be the outcome of independent research; and, to ensure this, we consider that it would be necessary for it to be financed by the Ministry.

It is true, of course, that the two Scottish electricity

consultative councils and their local consumers would not be covered by an appointment of a consumer member to the Electricity Council, since the writ of the latter body does not extend to Scotland. On the other hand, there seems no reason why such member, if appointed, should not establish a mutually useful liaison with the two Scottish consultative councils and also have his own access to the Secretary of State for Scotland. By doing this, he could help, in an informal and *ad hoc* way, to offset any tendency for the Scottish electricity consumers to become "isolated"; and he could also help to provide something of a bridge, at a level at which this appears to be lacking, between the Scottish and English electricity consultative councils, when any nation-wide policy matters of general consumer concern were at issue. No interference with the present position of the Scottish consultative councils would be involved. At the same time, the councils would stand to gain by access to the services of any central research staff that was set up.

A further suggestion, which would seem to fit in with the national role of two such consumer members, is that they should each, along with the chairman of the Domestic Coal Consumers' Council (see also the chapter following), become members of the Energy Advisory Council, set up by the Minister early in 1965 to advise him on overall fuel policy. At present, the Council has on it no representatives specifically concerned with the domestic, as distinct from the industrial, consumer interest. Since there are signs that it is to become more active as a national fuel policy shaping body in the future than it has been hitherto, it seems to us vitally important that there should be an adequate domestic consumer representation participating in its deliberations.

Though we have suggested that the appointments of consumer members to the Electricity Council and the Gas Council should be on part-time basis, it is clear that the further and supporting responsibilities that we have outlined for these members—namely, of liaising with the consultative councils, directing an independent research staff, having a direct relationship with the Minister and being members of the Energy Advisory Council—would constitute a very full call on the remainder of their working time. In effect, therefore, the appointments overall would amount to full-time commitments. And, while part-time membership of the Councils would no doubt carry a salary payable from industry sources, we suggest that it would be more in the interests of the independence of the two members if the remainder of their salaries (which would no doubt be the larger portion) were to come from the Ministry.

For these suggested appointments to prove suc-

cessful and to achieve their purpose, much would depend, in the end, on the suitability of the persons actually selected for the tasks. An ability to exercise an objective independence of judgement would, for instance, be a first requirement for those selected; also, a facility for lucid and cogent presentation of a case, whether to their Council, to the Minister or to the consultative councils in their industry. Moreover, apart from needing to have a general mastery of their consumers' problems throughout the country,

they would need also to acquire a comprehensive grasp of the essentials of their industry, in particular of its broad technological developments and, in more detail, of its economic problems and policies. Only if thus equipped, it seems to us, would they be able to play their full part in upholding the consumers' interest in a *realistic* way, at once related to the whole context of their industry and guided by an assessment of issues, as these arose, that was balanced rather than just partisan.

Chapter Four

The Domestic Coal Consumers' Council and the Approved Coal Merchants Scheme

Two coal consumers' councils were set up under the Coal Industry Nationalisation Act of 1946 (see Appendix I(4)). One of these was the Industrial Coal Consumers' Council; the other, the Domestic Coal Consumers' Council. Both were charged under the Act with the duties of considering any matter affecting the sale or supply of *all* forms of solid fuel—coal, coke or manufactured—the former body being concerned when the fuel was for industrial use or for export and the latter when for domestic or other purposes. Since by far the largest supplier of solid fuel is the National Coal Board (currently supplying around 85 per cent of the total), it has been with the sale and supply of the fuel products of this organisation that the councils have been for the most part concerned. The other suppliers involved are the gas boards, which supply gas coke (accounting for about 10 per cent of the total), and private fuel manufacturers, supplying such fuels as coalite and revoco (about 5 per cent).

Though our particular concern in this study is with the Domestic Coal Consumers' Council, and it will be about this body that we shall be talking in this chapter, much of what we have to say in regard to it will be equally applicable to the Industrial Coal Consumers' Council.

Main Features

Apart from being the first to be formed of the organisations with which we are dealing in this study, the Domestic Coal Consumers' Council (like the Industrial Coal Consumers' Council) differs from those in the other nationalised industries in several important respects. It is called a 'consumers' council and not a 'consultative' one; its membership includes Coal Board and retail, as well as consumers', representatives; it is directly responsible to, and financed by, the Minister of Power and not the industry; and it is a central body only, with no regional machinery of its own. These are all significant distinctions, each calling for comment.

'Consumers' or 'Consultative' Council

The exact line of demarcation between a 'consumers' and a 'consultative' council (or committee) in the context of the nationalised industries is not one that is very clearly defined. In theory, if a council is consulted by any authorities responsible

for making decisions which affect the interests of the consumers the council represents, then, to that extent, it would seem reasonable to assume that it was functioning as a consultative body. What is more, this would seem to hold good, regardless of whether the consulting authority was the Minister or a nationalised board. In fact, however, the tacitly accepted convention seems to be that a council is entitled to be regarded as a consultative body only if the board (or boards) of the industry concerned has itself a defined right or requirement to consult it; otherwise, it is not. Thus, for the Domestic Coal Consumers' Council (and equally for the Industrial Coal Consumers' Council), while the Minister himself may refer matters to it for consideration and report, the fact that neither the Coal Board nor any of the other suppliers are either authorised or required to do so, makes it, on the basis of that definition, not inappropriate to regard the Council as a 'consumers' council only. By contrast, in the case of the electricity and gas consultative councils, not only may the area boards of the respective industries refer matters to the councils for their consideration but they (the boards) are obligated by statute to inform the councils of their general plans and arrangements and to consider any representations on them which the councils may make. By definition, therefore, these councils are 'consultative' councils, in fact as in name. In the further case of the transport consultative committees (which we will be considering in the next chapter), the Minister and the relevant nationalised boards may refer matters to the committees (either to the Central Committee or to the area committees), but there is no obligation for them to do so. None the less, they, too, are properly entitled, on the above definition, to be called 'consultative' bodies.

Considerations of definition apart, the important fact that emerges is that the Domestic Coal Consumers' Council has no statutorily endorsed consultative link with the Coal Board or with the other solid fuel suppliers and no direct right of approach to them in the consumers' interests. The only formal provision for it to be consulted is by the Minister and its only right of representation is to the Minister. Thus, the Minister may consult the Council about what the Coal Board is proposing to do; or he may, in response to a representation from the Council, give remedial directions to the Coal Board. Equally,

of course, this will apply in regard to the gas boards, in the event of any matter connected with gas coke being at issue. But in so far as private manufacturers of fuel are concerned, the Minister is not involved.

In practice, there is some dilution of the principle. Private manufacturers of solid fuel, who have no obligation to do so, generally notify the Council about price changes in the fuels they supply. So, too, does the Gas Council on behalf of the area gas boards in regard to the price of gas coke. Previously, the Gas Council merely informed the Council about a price change after the change had been put into effect; more recently, it has agreed to submit pricing proposals in advance. More significant, however, by way of providing personal links between the Council and the fuel suppliers, is the presence of representatives of the Coal Board and the Gas Council on the Domestic Coal Consumers' Council itself. Similarly, links are also provided between the Council and the fuel distributors by having representatives of the retail trade on the Council. More recently, the chairman of the Council has come to have another link with the retailers by sitting as an assessor (i.e. non-voting) on the National Panel of the Approved Coal Merchants Scheme.

Membership of the Council

As already indicated, the Domestic Coal Consumers' Council (and also the Industrial Coal Consumers' Council) has a membership composed not only of consumers' representatives but also of representatives of both producers and distributors. In this respect, it is quite unlike the consultative organisations in the other three industries which are representative of consumers only (though, prior to the Transport Act of 1962, each transport consultative committee had two British Transport Commission representatives among its members). Under the nationalisation Act, it is laid down that the Minister shall appoint as members of the Council such persons as he may think fit to represent: (a) the (Coal) Board; (b) the consumers of coal, coke and manufactured fuel for domestic and other (non-industrial and non-export) purposes (after consultation with such bodies as appear to him to be representative of these consumer interests); and (c) 'persons engaged in organising or effecting the sale or supply of coal, coke and manufactured fuel' for these purposes. As with membership of the electricity and gas councils, the capacity to exercise a wide and impartial judgement, together with adequate knowledge of the particular interests they represent, are the basic qualifications looked for in members.

The present membership of the Council totals thirty, including the chairman. Twenty-one of these

(including the chairman) are 'consumers' representatives, ten coming from local authorities (six being members of these authorities, three officials and one a weights and measures chief inspector), eight from women's organisations, two from the trade unions and one independent. The retail distributors have six representatives on the Council (two of them from co-operative organisations) and the suppliers three—two from the Coal Board (one a member of the Board and the other the director-general of marketing) and one from the Gas Council (the supplies officer and coke marketing executive). Thus, with nine representatives between them, the suppliers and distributors account together for about a third of the Council's membership. (The Industrial Coal Consumers' Council also has three supplier's representatives among its members—two from the Coal Board and one from the Gas Council—and a number of wholesale trade representatives).

In some degree, this membership composition of the Council reflects the rather 'mixed' structure of the industry itself. While the Coal Board has a near monopoly in the production and supply of fuel, it has—unlike the electricity and gas boards—very little (at least direct) control over distribution, except to the limited extent (mainly in the north west) to which it has its own retail outlets. For the rest, retail distribution is wholly in the hands of private merchants in competition with one another. As a result, there are, from the consumers' point of view, two distinct and separately-controlled sectors of the industry which have a hand in providing him with his supply of solid fuel—the one largely monopolistic, the other competitive. By having representatives of these two sectors on the Council, as well as representatives of consumers, there is thus a kind of tripartite confrontation underlying the Council's deliberations. It would seem, however, according to what we have been told, that the arrangement has in fact worked quite well—despite the potential for conflict which must inhere in such an arrangement. No doubt the circumstance that the three elements have tended to line-up differently for different problems has helped in this. Sometimes, apparently, there has been a line-up between the consumer and retail elements against the supplier; sometimes, between the consumer and supplier against the retailer. Moreover, we understand that the Council has, from time to time, reached decisions and made recommendations at variance with the advice tended by the Coal Board members and that these have been readily accepted and have not given rise to embarrassment or difficulty. The presence, too, of leading suppliers' and distributors' representatives at Council meetings is obviously of great help in

ensuring that the Council is fully informed about all relevant aspects of issues under discussion. But whether this calls for membership rather than attendance is another matter and one to which we shall be returning later in the chapter.

Organisation, Finance and Working

We have already referred to the fact that the Council's right of representation is to the Minister only and not to the industry; and that formal consultation with the Council can be initiated only by the Minister and not by the industry. Its position in this regard is, therefore, quite different from that of the electricity and gas consultative councils. It is also different from that of the transport consultative committees. Moreover, the secretary of the Council (and also of the Industrial Coal Consumers' Council) is a Ministry of Power official, whose services to the two coal consumers' councils are part-time only, since he is also employed on Ministry work. The Council, which meets about five or six times a year, has (like its industrial counterpart) to make an annual report direct to the Minister, who lays it before each House of Parliament.

The same direct relationship to the Minister exists in so far as the provision of Council funds is concerned. These come from the Minister, subject to the concurrence of the Treasury, and cover the provision of offices and staff and the payment of allowances to members and of salaries and allowances to staff, together with such further expenses as the Council may incur. Thus, no call whatever is made on the industry for the financing of the Council (or for that of the Industrial Coal Consumers' Council). This, again, is also directly contrary to the arrangements obtaining for the electricity and gas councils, as well as for the transport committees.

The position of the Council as a central body without supporting regional machinery—another of its distinctive features—is not due to any lack of provision under the nationalisation Act for the setting up of such machinery, if required. The Act explicitly provided for the Minister, if he wished, either on his own initiative or in response to recommendations from the Council, to appoint regional domestic (and also industrial) coal consumers' councils for prescribed localities. But no such councils have in fact been set up. The generally given explanation for this is that the major role of the Council is that of dealing with policy issues, which are for the most part nation-wide rather than local in incidence, and that, for this, little purpose would be served by the existence of regional councils. This argument has been reinforced during recent years by the coming into being of the Approved Coal Merchants Scheme,

with its own regional organisations, which we will be discussing below. Only to a small extent is the Council itself concerned with consumers' complaints, and then only as an ultimate 'court of appeal' if the facilities which exist for settling them at a local level have failed to satisfy the complainants.

Among the many matters that have been considered by the Domestic Coal Consumers' Council are: coal supplies and shortages; distribution problems; summer stocking and summer prices; re-grouping of house coals; moisture content; smokeless fuels; appliances; concentration depots (in conjunction with the railways); and fuel prices generally. In particular, the Council has on a number of occasions in recent years taken up with the Minister questions relating to solid fuel prices, such as protesting against the introduction of selective price increases, urging an alleviation of the Coal Board's burden of interest payments in order to obviate further price increases for the current consumer and conducting its own survey of retailers' margins in the domestic solid fuel trade (the conclusions from which proved to be, albeit for a slightly earlier period, not inconsistent with those reached by a separate survey undertaken by the National Board for Prices and Incomes). But perhaps most important among its efforts on the consumers' behalf was the part it played some years ago in urging the case for the adoption of a code of practice by the coal distributing trade and thus in helping to bring into being the Approved Coal Merchants Scheme.

The Approved Coal Merchants Scheme

The Approved Coal Merchants Scheme was set up in 1962, with the approval and support of the Minister of Power and of the Domestic Coal Consumers' Council. The sponsors of the Scheme are the National Coal Board, the Coal Merchants' Federation, the National Council of Coal Traders, the Seaborne Coal Traders' Association and the Co-operative Union Limited. These five bodies—the one coal supplying, the other four coal trading—are its controlling bodies, responsible for appointments to its panels and for the provision of its finance.

Objects of the Scheme

The objects of the Scheme are: (a) to define a basic standard of service below which the services of coal retailers, delivering to consumers' premises, should not fall and, as a part of that general requirement, to provide means to enable consumers to identify the producers' grades or qualities of solid fuels which they are buying; (b) to encourage retailers to provide additional services to match the rising standards expected under today's conditions;

and (c) to provide means to enable the consumer to identify retailers who are subject to the requirements of the Scheme.

Administration

The Scheme is administered by the sponsors through a national panel and twelve regional panels (Appendix II (3)). Appointments to the panels are made by the sponsors and each sponsoring organisation is represented on the national panel and on the regional panels in areas in which it trades. The membership of the National Panel is composed of an independent chairman, appointed by all five of the sponsors jointly, and not more than eight other members. Of these latter, four are representatives of the National Coal Board, two of the Coal Merchants' Federation, one of the Co-operative Union Limited and one representing both the National Council of Coal Traders and the Seaborne Coal Traders' Association jointly. In addition, and also appointed jointly by the sponsors, there are two 'assessors' serving on the Panel—the chairman of the Domestic Coal Consumers' Council and the director of the Coal Utilisation Council. These two latter, while entitled to attend all meetings of the National Panel and to take part in its deliberations, are not entitled to vote on any formal resolution. Membership of the regional panels is limited to six or seven members—two each from the National Coal Board and the Coal Merchants' Federation, one each from the Co-operative Union Limited and the National Council of Coal Traders and one from the Seaborne Coal Traders' Association in those regions concerned with seaborne trade. The chairmen of regional panels are elected annually by the panels themselves from among their number. There are no consumer representatives attached to the regional panels.

Responsibility for the working of the Scheme rests with the National Panel, operating through its regional panels, each of which has a secretary who handles the day-to-day conduct of its affairs. The Panel has powers to give directions to all or any of the regional panels, to decide all matters referred to it by these panels and to propose changes in the Scheme to the sponsors, if these seem to be called for. The regional panels, in their respective areas, deal with matters of admission to, and termination of, membership of the Scheme and with ensuring that the requirements of the Scheme are being met and its objects pursued. The detailed requirements imposed on members differ according to their category of membership.

Members of the Scheme

There are three different classes of membership of the Scheme, categorised on the basis of the services provided. These are: the 'Authorised Coal Dealer', the 'Approved Coal Merchant' and the 'Diploma Coal Merchant'.

The requirements for all categories of members include the clear display of their names and addresses on all delivery vehicles; the provision of information to their customers of the group number or producers' description of the fuel being purchased; the display of the appropriate sign (i.e. of authorised coal dealer or of approved or diploma coal merchant) on vehicles, business premises and letter headings and other documents; compliance with the relevant parts of the Merchandise Marks Acts and the Weights and Measures Act; and the investigation of consumers' complaints. Moreover, a new requirement is that all members shall make certain documents and records available to weights and measures inspectors, so that solid fuel descriptions can be subject to further checking in the consumers' interest.

For approved coal merchants and diploma coal merchants, however, there are further requirements with which they must comply. The approved coal merchant must be able to supply an adequate range of solid fuels throughout the year, deal with the winter needs of customers and supply the most suitable fuel for customers' appliances. The diploma coal merchant, besides complying with all the requirements demanded of the approved merchant, must hold the diploma awarded by the Coal Utilisation Council and maintain a reasonable minimum stock of fuels at all times. The diploma is awarded only to firms which have a staff trained to advise customers on the choice of fuels and appliances and generally offer a high standard of service by reason of the range of fuels supplied and the situation and condition of the offices and organisation.

Full details of the various services provided by these three different categories of members can be obtained on application from any of the Scheme's panels, the names and addresses of which are listed in Appendix II (3).

Although the Scheme has been in existence for only five years, its membership coverage is now all but complete, so that virtually all of the solid fuels now sold retail are sold by members of the Scheme. This development was helped by the extension of the Scheme in 1964 to include as members the category

of authorised dealers, in addition to the two existing categories of approved merchants and diploma merchants. At the time of writing, the total membership (giving a coverage of about 97 per cent) is approaching 12,000. The approved merchants are the most numerous, accounting for just over 7,000 members, the authorised dealers next with just over 3,000 and the diploma merchants the smallest group with nearly 1,500 members.

Comments on the Scheme

Every member of the Scheme is obligated to investigate quickly and sympathetically all customers' complaints brought to his attention, whether about fuel or about the service provided, and to make good any genuine grounds for grievance. And by far the majority of such complaints—about 94 per cent in the case of the sample in our own field survey—are taken direct to the merchants in the first place and, for the most part, settled by them. There are, however, always some complaints which the merchants themselves are either unable or unwilling to settle. It is these complaints that will normally be brought before the regional panels, to be dealt with directly if they concern the services provided by the merchants or to be taken up with the Coal Board if they are concerned with the fuel supplied. But the number of such complaints which reaches the panels is, we understand, fairly small. This is no doubt largely a reflection of the fact that most complainants are satisfied with what the merchants are able to do for them; but is also probably connected with the circumstance that the Scheme is still comparatively new and as yet not very well known. Members of the Scheme do, however, keep their regional panels informed of any persistent complaints which appear to call for more general remedy and of any significant changes noted in the pattern of complaints.

But important to the Scheme as complaints from consumers are, both in enabling it to satisfy those consumers who have grounds for discontent and to learn where and in what connection such grounds arise, this side of its work is essentially residual. The Scheme's principal concern, as we have seen, is to improve the standards of retailing service and to press for improved quality and readier identifiability of fuels and for continuity in their supply. And to the extent that it is successful in this, it will be successful, too, in minimising causes for complaint.

In conception as in operation, the Scheme is, of course, designed as a first consideration to further the interests of its members, the retail merchants, but to do so through the provision of better service to the domestic consumer of solid fuels, over and above what he himself is able to command by the exercise

of his sanction of choice in a competitive market. It is also designed, indirectly, to further the interests of the Coal Board, as the main supplier, by helping to develop, through better service, the market for coal and other solid fuels in face of growing competition from gas, electricity and oil. Its service to the consumer, important and indeed beneficial as this is, is therefore only derivative, not primary. Even so, it does seem, in our judgement, to provide in practice a quite effective system, well suited to the particular structure of the industry, for protecting the consumer against what were evident defects in the old system of unregulated retailing of solid fuels and of helping him to obtain better fuels and better service. In fact, adherence by retailers to a code of practice, such as the Scheme enforces on its members, marks a very healthy development. And the growing liaison between the Scheme and the weights and measures inspectorate, where their respective areas of interest converge, is another development in the right direction. Moreover, the Scheme's powers of enforcement are very real and are readily applied to those of its members who transgress. For not only does its membership now embrace all retailers apart from a very marginal few, but fuel supplies from the Coal Board are no longer available to merchants who are not in the Scheme or who have been excluded from it. The Scheme has the sanctions, therefore, to give 'bite' to its directions.

There remains the question, however, as to how well, given its primary motivation, the Scheme can assess and serve the consumer interest; and also how adequate, aside from its contacts with complainants, are its communications with consumers.

Organisationally, the only existing provision for the representation of consumer opinion on any of the panels is that of the appointment by the sponsors of the chairman of the Domestic Coal Consumers' Council to serve as an assessor on the National Panel. And this is an important—and, in our view, very appropriate—provision, not least perhaps because the Council itself played an influential part in fostering the idea of the Scheme in the first place. It is true that the chairman of the Council, as an assessor, has no voting rights on the Panel, since these are limited to representatives of the sponsoring organisations, which are parties to the inaugural agreement setting up the Scheme and responsible for its financing. In practice, we understand that this makes little difference to the usefulness of the present arrangement, since Panel decisions are rarely arrived at on a voting basis but rather by general agreement. Moreover, the Council's chairman has always in reserve the right of direct approach to the Minister (to whom one of the Scheme's sponsors, i.e. the Coal

Board, is also responsible), if this should be called for in the consumers' interest. None the less, we feel that little would be lost and something gained if the voting rights were to be extended to embrace the one representative of the consumer interest on the Panel. On the other hand, the lack of any equivalent consumer representation on the regional panels is, we think, something of a weakness in these bodies; yet it is one to which there is at the moment no ready solution, as no obvious representatives are at present available for appointment. If and when such representatives become available (see also below), it is to be hoped that steps will be taken to appoint them to the regional panels.

Apart, therefore, from having the chairman of the Domestic Coal Consumers' Council to serve on the National Panel, the Scheme's informative links with consumers are limited to those resulting from the approaches of complainants, the reports of merchants and such consumer research studies as are carried out by one or another of the sponsoring organisations, such as the Coal Board. Moreover, the chairman of the Council provides the only representative consumer voice participating in its deliberations. And so far as conveying to the consuming public the facts about its own existence and about the services it offers is concerned, the Scheme is dependent on such publicity as it can undertake on a limited budget. At present, this publicity comprises, in addition to the obligatory display of signs by its three classes of members, the display of posters in merchants' offices and on public boardings and elsewhere, the distribution of leaflets and a certain amount of press advertising. Even so, the extent of public awareness of the Scheme is still, we have reason to believe, very limited—our own field survey, it will be recalled, showed that only 8 per cent of the sample had heard of it. There does, therefore, seem to be need for a more effective and thoroughgoing public projection of the Scheme, making use perhaps of some of the publicity suggestions we advanced in the previous chapter for the electricity and gas consultative councils. What is more, if the sponsors are not able or willing to make sufficient finance available for this, we suggest that, since the Scheme has the support of the Minister, it would not be inappropriate for some additional assistance to be provided for this purpose from Ministry sources.

Complaints to the Council

In its latest annual report, the Domestic Coal Consumers' Council records that 'a small, but reduced, number of individual complaints' was received during the year and in the majority of these 'an amicable settlement was reached between the

consumer and supplier'. The Council goes on to say that it understands that fewer complaints have been received by the distributive trade and that this may be attributable to an improvement in the quality of fuels supplied by producers and to improved service by merchants.

When an individual consumer has a complaint about his solid fuel supply, his first action should be to approach the local merchant from whom he obtained the supply. Generally, the merchant should be able to put the matter right, whether the complaint is about service (e.g. about delivery) or about quality. If, however, the merchant cannot—or will not—satisfy the complainant, then, if the complaint is about service, the latter may resort to a regional panel of the Approved Coal Merchants Scheme or, if about quality, to the producer of the fuel (e.g. the Coal Board). But when, as sometimes happens, a complaint about quality is referred to a panel of the Scheme instead of to the producer, the former will endeavour to settle it in conjunction with the latter. Only if these recourses fail should the consumer, normally, approach the Domestic Coal Consumers' Council. The Council will, however, always deal with any complaints it receives direct, even though these have not been followed up in accordance with the laid-down procedures. In general, we understand, reasonable solutions to consumers' problems are reached fairly quickly.

Observations and Suggestions

The Council and the Consumer

There is no doubt that the Domestic Coal Consumers' Council is much less known about than it ought to be. Neither the fact of its existence nor the useful work it has done, and is doing, on behalf of the domestic consumers of solid fuels seems to have made the impact that is needed if the Council is to develop its full effectiveness and to enhance it in the future. That the Council is primarily concerned with matters of policy and only marginally with complaints from individual consumers is no doubt partly responsible for this and also for the circumstance that it is less well known to the public than the Approved Coal Merchants Scheme, even though the latter has been in existence for only five years. Yet, as a study of some of its more recent annual reports will suggest, there is ample material for more publicity than has so far been received. There would seem to be, therefore, a need for greater emphasis to be placed on publicising the work and role of the Council than has been attempted in the past.

None the less, the fact that the Council has no regional machinery of its own must inevitably set limits to the public awareness and interest it can

engender. Local solid fuel consumers cannot come to know about a central body, like the Council, in the way that local electricity and gas consumers can come to know about their own local consultative councils. But whatever might have been the arguments in favour of doing so earlier, there can be no case now for the setting up of regional coal consumer councils, even though still provided for under the Act. For, with the coming into being of the Approved Coal Merchants Scheme, much, if not most, of the work that such councils would be expected to do is already being dealt with by the regional panels of the Scheme.

At the same time, there does appear to be something of a gap in the machinery, both from the Council's point of view and from that of local consumers. So far as the Council is concerned, its links with local consumers are limited to those provided by those of its members who represent the consumer interest on behalf of local authorities or other local bodies; and also, at a further remove, to the chairman's membership of the National Panel of the Approved Coal Merchants Scheme. From the point of view of local consumers, there is a lack of any readily identifiable fuel consumer body at the local level which is in close touch with their particular needs and can handle their problems and advise them on how to proceed with their complaints. For, however dedicated and helpful a regional panel of the Scheme, it is not primarily a consumer body and it is certainly not identifiable as such by name. This difficulty of ready identification, as bodies of one sort or another continue to proliferate, we have already drawn attention to when discussing the committees of the electricity and gas consultative councils. We suggested then that, largely in view of this difficulty, there might be merit in moving towards the setting up of joint fuel consumers' committees to serve the localities at present being served by separate electricity and gas (district or local) committees and that on these fuel committees should sit not only representatives appointed by the electricity and gas consultative councils, respectively, but also one or more representatives of the local solid fuel consumers, these representatives to be appointed perhaps by the Domestic Coal Consumers' Council. If this were done, then these latter members of what would be readily recognisable local fuel consumers' committees would be at hand to help solid fuel consumers with their complaints and, as necessary, to advise on where to direct them. They would also, being in direct and frequent contact with local consumers, be able to brief the Domestic Coal Consumers' Council itself about local problems to an extent that is not possible under present ar-

rangements, thus in effect, bringing it into much closer touch with local consumers. And, moreover, from among the solid fuel members of these committees, it should be possible to make available, if called for, representatives to serve (if only as assessors) on the regional panels of the Approved Coal Merchants Scheme.

An arrangement, such as or similar to this, would, we suggest, if it were to be adopted, do much to bring the existence, facilities and work of both the Domestic Coal Consumers' Council and the Approved Coal Merchants Scheme more to the attention of solid fuel consumers generally. Not only would it help to provide the additional publicity for these organisations that is needed but it would at the same time close what seems to be a gap in the existing machinery and do so by complementing, and not overlapping, the work of both the Council and the Scheme. Any progress along these lines must, however, wait on parallel developments in the other two fuel industries.

The Council's Independence and its Consultative Role

The fact that the Council is independent of the coal industry and is responsible directly to, and financed directly by, the Minister is, without doubt, of considerable advantage to it in furthering the interests of solid fuel consumers, if need be in the face of opposition from the industry. In this respect, it is better placed than the electricity and gas consultative councils. On the other hand, it would be unfortunate if it were to regard itself, because of this dependence on the Minister, as being inhibited from taking an independent line, if it considered this to be necessary, in respect of Government policies towards the industry (e.g. concerning rates of return on assets, support policy by means of a protected market, etc.). While there is no evidence to suggest that the Council does feel inhibited in this way, we consider it important to emphasise that, in our view, it should regard itself as being fully entitled to urge the consumers' interest, when and in so far as it believes it to be desirable, not only against the policies of the industry but also against those of the government of the day.

Moreover, it seems to us that the Council's position and effectiveness would be enhanced if the scope of its consultative role were to be enlarged. At present, as we have seen, it can be consulted by the Minister but not by the Coal Board; and it can make representations to the Minister but not to the Board. This lack of any overt provision for direct consultation between the Council and the Board and the dependence of such indirect consultation as does take place on the discretionary mediation of the Minister

seems to us to be unnecessarily restrictive. Without in any way compromising the Council's present independence of the industry, it should not be difficult to make formal provision for the Council to be consulted directly by the Board and for it to make representations direct to the Board. Given this facility, it would then become, as, in our view, it should become, a fully 'consultative' body, in the sense of the conventional definition of such a body referred to earlier in the chapter. It would then be appropriate, we suggest, for the Council's name to be changed accordingly—to become perhaps the 'Domestic Coal Consumers' Consultative Council'.

Suggested Changes in the Membership Structure

If the Council is to exercise a consultative role to the full, it does seem to us entirely inappropriate for about a third of its membership to be composed of representatives from the 'supply side' of the industry. And especially at variance with the whole concept of its independence in upholding the consumers' case is the presence on the Council of representatives of the Coal Board and the Gas Council—helpful and co-operative as these representatives are readily acknowledged to be. It is difficult to accept that their influence, especially when the industries they represent are under criticism, does not on occasions dilute to some extent the independence of the Council's collective judgement; while their registered dissent, when some resolution is taken with which they disagree, though it makes working together on the Council a practicable process, must unavoidably, we feel, diminish the force of that resolution. On the other hand, the ability of these representatives to provide specialised and authentic information about their industries, to explain difficulties that have arisen and to put over the views of the Coal Board or the Gas Council must, without doubt, be extremely valuable to the Council's deliberations. We would recommend, therefore, that the representatives of the Coal Board and the Gas Council should cease to be members of the Council, but that they or equivalent spokesmen for the two industries should continue to be available, on request, to brief the Council at meetings.¹

Turning to the retail trade representatives on the Council, of whom there are currently six, we feel that, with the setting up of the Approved Coal Merchants Scheme, so large a representation from this sector of the industry is no longer necessary. For they, like the producers' representatives, must tend to weaken, to some extent, the independence of the Council as a body representing the consumers' interest. At most, we would think, there is need for perhaps one, but not more than two, such members,

since they are of help to the Council in keeping it informed about the facts of retailing at the point of contact with consumers. But we do not think that they should be entitled to vote on Council resolutions. It is also for consideration as to whether the Minister, in appointing these representatives, should not now select them from among the members of the National Panel of the Approved Coal Merchants Scheme, thus extending the liaison between this organisation and the Council.

The effect of these suggested removals from the Council's membership would, if adopted, leave it short of its present strength by some seven or eight members, who would need to be replaced by consumers' representatives. These, we suggest, it might be most advantageous to select largely on a regional basis, so that, along with those consumers' representatives on the Council already selected on such a basis (e.g. members of local authorities), they would provide a fairly comprehensive regional coverage of the country. They would then each be well placed to establish liaison with the regional panels of the Approved Coal Merchants Scheme and, if ever the occasion should arise, to provide the Council's links with any solid fuel consumers' representatives on local fuel consumers' committees set up on the lines we have suggested above.

The Chairman and the Secretary

A further suggestion which we have to make, and one which would offset in a converse sense the departure of the two Coal Board representatives from membership of the Council, is that the chairman of the Council should be appointed as a part-time member of the Coal Board in an *ex-officio* capacity. In this way, the chairman would be well placed to ensure that the consumers' case was always clearly before the Board; and also to be consulted by the Board in regard to the consumer implications of its plans and policies, referring as necessary to the Council such matters as called for a Council view. Moreover, if adopted, this arrangement would provide the obvious bridge for the development of a direct consultative link between the Board and the Council, such as we have suggested to be desirable.

¹ It is of interest to note that, as the result of an amendment moved in the House of Lords by Lord Eroll of Hale, no nominations are to be made by the National Steel Corporation, under the Iron and Steel Act of 1967, to membership of the Iron and Steel Consumers' Council (established under section 8 of the Act). In accepting the amendment, Lord Shackleton (Minister without Portfolio) said that, while there was a good deal to be said for having representatives of the Corporation sitting with the Consumers' Council, they (the Government) had decided, despite these arguments, that 'the need to increase the independence of the Consumers' Council is decisive and that it is necessary to make plain that the Council really is an independent body'. (House of Lords Debates, Vol. 283, No. 122, 9th March, 1967.)

Also, as already indicated in the previous chapter, we consider that the chairman of the Council should (along with the consumer members we have suggested for the Electricity Council and the Gas Council, if these came to be appointed) become a member of the Minister's Energy Advisory Council, so as to provide a representative on the Council of domestic solid fuel consumers.

Finally, it seems to us to be desirable that the Secretary of the Council should serve on a full-time basis, whether seconded, as now, from the Ministry or appointed independently from outside.

While the above proposals and suggestions relate to the Domestic Coal Consumers' Council, several of them appear to be not less suited to the Industrial Coal Consumers' Council—so far as we are able to judge without having made a special study of that Council's work and problems. In particular, the two which appear to be most appropriate are the exclusion of the Coal Board and the Gas Council representatives from the Industrial Council's membership and the appointment of its chairman to be a part-time *ex-officio* member of the Coal Board.

Chapter Five

The Transport Consultative Committees

Our study of the consultative machinery in the public transport industry has, for a number of reasons, had to be much more abbreviated than that of the machinery in the electricity and gas industries. Moreover, since the whole industry is passing through a phase of transition and the future transport policy for the country has not yet been given any final shape, it has not been possible for us to arrive at more than provisional conclusions. That the role of the consultative committees in the industry is substantially on the change is only too evident; but the large element of conjecture still present precludes more than tentative and conditional pointers of a general nature as to how we see that role developing in the future.

As our field survey has shown, the transport users consultative committees—often referred to as 'area committees'—are the least known about of all the consultative bodies in the four industries and the least used. There appear to be several reasons for this. One is no doubt due to the fact that, whereas a defect in, say, a central heating installation in a house is apt to persist until the sufferer is provoked to take some action and complain, a discomfort on a railway journey, such perhaps as an ill-heated compartment, however exasperating at the time, tends to be quickly forgotten once the journey is over. Another is that the consultative committees do not appear to have gained publicity for themselves and their activities locally to the extent that the consultative councils in the electricity and gas industries have done. A third, and perhaps the most important, is that, as a result of the Transport Act of 1962, the scope and responsibilities of the committees have been drastically curtailed as against what they were when the committees were first set up under the nationalisation Act of 1947.

The Present Scope of the Committees

When the transport consultative committees—which include the Central Transport Consultative Committee and eleven area committees—were formed in 1947 (Appendix I (5)), they were specifically entitled to consider and, where necessary, to make recommendations in regard to 'any matter (including charges) affecting the services and facilities' provided by the (then) British Transport Commission which was the subject of representations made to them by users of those services or

facilities; or appeared to them to be a matter to which consideration ought to be given; or was referred to them for consideration by the Minister or the Commission. Since the Commission, which was set up under the Act, controlled not only the nationalised main line railways and London Transport but much of the road transport, docks, inland waterways and ancillary undertakings, the range of matters which could be considered by the committees was very wide indeed. The Transport Bill of 1952, for instance, was considered by most of the area committees and a report, containing their views and recommendations in regard to certain aspects of the bill, was submitted to the Minister. The Minister also consulted the Central Committee in the same year about the Commission's (Passenger) Charges Scheme and, over the next few years, about a number of other major matters, including the reorganisation of the railways. The Commission itself about this time referred its modernisation and re-equipment plan for the railways to the Central Committee; also its annual report and accounts, a report of the Board of Survey on Canals and Inland Waterways and other matters of substance.

Today, however, the position is very different. The Transport Act of 1962 (Appendix I (6)) abolished the British Transport Commission, with its overall control of public transport, and created in its place four separate and entirely distinct nationalised boards—a Railways Board, a London Transport Board, a Docks Board and a British Waterways Board—and a Holding Company, under the last of which were placed all nationalised road transport, both passenger and freight (other than railway collection and delivery services and London Transport bus and coach services), previously owned by the Commission, and most of its ancillary undertakings. At the same time, it limited the concern of the consultative committees to the services provided by the four boards. It therefore excluded them from consideration of the facilities provided by the subsidiaries of the boards (except for those of the Caledonian Steam Packet Company Limited and the Caledonian Steam Packet Company (Irish Services) Limited, both wholly-owned subsidiaries of the Railways Board) and of those provided by the Holding Company and its subsidiaries. Effectively, this led in practice to the committees becoming principally concerned with rail transport services and,

apart from the bus and coach services provided by London Transport, only to a limited extent (e.g. when advising on bus services as an alternative to closed rail services) with road transport services. They have also no concern—and have never had—with air transport services, these being handled by the Air Transport Advisory Council. The Act of 1962 however, went even further and disallowed consideration by the committees of the charges made for any service or facility provided by the boards; the withdrawal of freight services; and reductions in railway passenger or freight services. As a result, the committees have been left with only two fields of activity—that dealing with railway passenger closures and that covering 'quality of service' matters.

Prior to the Act of 1962, there was no statutory procedure laid down for considering passenger closure proposals, though a growing number of such proposals had begun to come up for consideration by the consultative committees. Since 1962, however, a laid-down procedure has been in force (details of which are set out in Section 56 of the Transport Act of 1962, reproduced as Appendix II(6), which has undoubtedly been of great help to the area committees in getting through the large volume of work in this connection that has come their way during the past five years. While the committees are limited, under this procedure, in their consideration of closure proposals to the context of 'hardship', and are not entitled, as previously, to examine the financial and other considerations involved, they are empowered to submit their reports direct to the Minister of Transport, sending copies only of such reports to the Central Transport Consultative Committee and to the boards concerned. In this field, the committees have done, and are doing, a great deal of very valuable work. For example, in nine of the decisions on railway closure proposals in the London Area, the Minister after considering the London Committee's reports on the hardship implications of the proposals, refused consent to four of them and, in regard to three of the others, acceded to the Committee's suggestions for additional alternative services. But closures on the scale of recent years add up to a 'once and for all' operation and it is expected that the present programme will be completed over the next year or two. Thereafter, this part of the area committees' work will, apart from isolated proposals which will no doubt come up from time to time, be virtually at an end. Since, of late, closure work has come to account on average for between 80 and 90 per cent of the work of the area committees (except for the London and the North Western Area Committees, where it accounts for about half), the fall-off in activity of the committees, once closures are at an

end and in default of other developments, promises to be very sharp indeed.

The other field of activity remaining to the transport consultative committees covers 'quality of service' matters, embracing freight services as well as passenger services. In this field, the area committees in England, while empowered to consider and, if they wish, make recommendations regarding the services provided by the four boards, subject to the limitations referred to above, must submit their conclusions and recommendations in the form of minutes to the Central Committee and to the boards concerned. The Central Committee, after considering the minutes, makes its own recommendations to the Minister concerning them. Thus, the area committees in England have no direct access to the Minister—unlike the Committees for Scotland and for Wales and Monmouthshire, which make their recommendations to him direct—over matters in this field of their work. On the other hand, both the Minister and the boards may refer matters to the consultative committees for consideration, though, since 1962, this does not seem to have happened very frequently. Also, the committees may themselves initiate enquiries. Examples of the matters dealt with by the committees under the general heading of 'quality of service' include: punctuality of trains; carriage of motor cars by train; use of small containers for freight; relief of overcrowding, particularly in the London Committee area; station car parks; the proper use of loud-speakers at stations; cleanliness of trains; duties of porters; advance booking of sleeper berths; curtailment of steamship services; facilities for embarkation at docks; and many others. The committees have also, from time to time, made special studies of particular problems, such as the whole of the services of the Metropolitan Line, the projected extension of tube railways in South London and the arrangements for the provision of taxi-cabs at railway stations. The London Area Committee's responsibility for 'quality of service' matters extends to those of the London underground system and of the bus and coach services operated by the London Transport Board and to problems arising in connection with the provision of a co-ordinated system of passenger transport for the area.

Before going on to consider the implications for the future of this post-1962 contraction in the scope of the transport consultative committees' responsibilities and to a discussion of the possibility of a new role in prospect, we will examine briefly below some of the aspects of the organisation and working of the committees at the present time.

Aspects of Organisation and Working

The Central Committee

The consultative machinery in the public transport industry, unlike that in the electricity and gas industries, is, as we have seen, topped by a central body—the Central Transport Consultative Committee. All appointments to the Committee are made by the Minister. Prior to 1962, the Committee was composed of an independent chairman; members to represent agriculture, commerce, industry, shipping, labour and local authorities; and members nominated by the British Transport Commission. Since that date, it has been composed of an independent chairman; the chairmen of all eleven of the area committees; and such other members (not exceeding six) as the Minister "may appoint after consultation with such bodies as appear to him to be representative of the interests of persons likely to be concerned with matters within the competence of the Committee". There are no longer any board representatives on the Committee.

In addition to dealing with 'quality of service' matters in connection with the services provided by the four boards which are essentially national rather than local in character, the Central Committee, as was pointed out above, receives copies of all the minutes of the area committees, whether these relate to closures or to quality of service matters. In so far as closures are concerned, the Committee has no longer any part to play. On quality of service matters (except in regard to those of the Scottish and Welsh Committees), the Committee sends the results of its own deliberations and, if necessary, its own recommendations to the Minister and to the boards concerned. The Minister himself has power to give to the boards concerned such directions as he thinks fit with respect to the matters dealt with in the recommendations. Since 1962, the Committee has been empowered to make recommendations to the area committees in connection with the procedure and functions of these committees. Its role in relation to the area committees is, therefore, both administratively and in regard to quality of service matters at issue, essentially a co-ordinative one. The fact that the area committee chairmen are now *ex-officio* members of the Central Committee enables the latter's views and recommendations on matters of national import to be, in geographical terms, of a more representative character than formerly. The Committee is also responsible for submitting an annual report to the Minister covering not only its own activities but also those of the nine area committees in England. The Committees for Scotland and for Wales and Monmouthshire submit their own annual reports direct to the Minister.

Chairmen, Secretaries and Members

Like the Chairman of the Central Committee, the chairmen of the area committees are all appointed by the Minister. In making these appointments, it is believed that the Minister is guided by the same basic requirement of capacity to exercise a 'wide and impartial judgment' as governs the appointment of chairmen of the electricity and gas consultative councils. For the rest, their backgrounds and particular qualifications appear to be as varied in the one case as in the other.

There is, however, one notable—and significant—difference between the position of chairmen in the transport committees and that of their counterparts in the electricity and gas councils. Whereas, in the latter, the chairmen are *ex-officio* part-time members of their area boards and are also paid, neither of these conditions applies to the chairmen of the transport area committees or to the chairman of the Central Committee. Having regard to the decisive advantages which appear to accrue from this practice in the case of the electricity and gas council chairmen, it would seem to follow that the transport committees must suffer by comparison. A purely voluntary chairman must, in general, tend to have less time available for the work than a paid one; and the absence of a board position must, it would seem, not only detract from his status and that of his committee but also from his influence with the boards on the consumers' behalf. On the other hand, the situation in the transport industry is rather different. Not only are there more transport area committees than there are regional boards—ten as against six—but there is little geographical coincidence in their boundaries. Moreover, at the centre, there are four boards with whose services the committees are concerned and not just one. While it does seem that this less influential positioning of committee chairmen as compared with that enjoyed by council chairmen in the two fuel industries can hardly have worked to the advantage of the transport committees, it is difficult to see how differently it could have been arranged—unless perhaps in regard to the payment of chairmen—under the present organisation of committee areas and board regions.

Six of the area committees have full-time secretaries. Of the others, the North Eastern and Yorkshire Area Committees now share a secretary and staff, as do also the South Western and the Wales and Monmouthshire Area Committees; while the secretary of the South Eastern Area Committee is available only part-time, being also engaged in an administrative capacity by the Southern Regional Railways Board. Although the secretaries are paid by the boards, their loyalties are to the committees

and not to the boards. Most of the present secretaries have been in office for a number of years, one of them for sixteen years. Two, however, were appointed about a year ago. Four of them had had previous experience of consultative committee work before taking up their present appointments. All of the secretaries—except the secretary of the London Area Committee, who came from the London Transport Board—have a railways background.

Members of the area committees, like those of the Central Committee, are appointed by the Minister. Apart from the chairmen, these include 'such other members as the Minister may appoint after consultation with such bodies as appear to him to be representative of the interests of persons likely to be concerned with matters within the competence of the committee and such other members (not exceeding two) as the Minister may appoint without such consultation'. The members would, therefore, appear to represent a cross-section of transport users as a whole. As with the Central Committee, there are no longer representatives from the boards on the committees. While attendances of members at committee meetings naturally vary, the record on the whole appears to be quite good—averaging about 75 per cent.

The availability of a sufficient number of suitable persons for appointment as chairmen and members of the committees is, we understand, becoming something of a problem and bids fair to become more of one in the future. Much of what we said, however, when discussing this same problem of the supply of voluntary service in connection with the electricity and gas consultative councils, is relevant here. It would seem either that there will be need for some reduction in the size of the committees or that the scope and importance of the work will need to be enhanced.

Finance and Location

Although the Central Committee is the immediate source from which the area committees receive their funds, the machinery as a whole is financed by the four nationalised boards (in such proportions as agreed between them or as the Minister directs). The boards provide the committees with 'such officers and servants, and such office accommodation, as appear to the Boards to be requisite for the proper discharge of the Committees' functions or as may be directed by the Minister'. Also, the boards 'may pay' to the members of the committees allowances in respect of loss of remunerative time (as approved by the Minister, with the consent of the Treasury) and travelling and out-of-pocket allowances (as the boards themselves determine). According to the individual committees, no difficulties have been

experienced as a result of this arrangement. Even so, we would be inclined to question, as we did in the case of the electricity and gas councils, the soundness of the principle which leaves discretion in the matter in the hands of the boards rather than of the Minister, in particular in regard to the adequacy of the accommodation and office equipment provided and to the scale of travelling and out-of-pocket expenditure allowed to members.

In regard to the location of area committee offices, all but three of the committees have accommodation quite separate from board offices and work quite independently. The three committees which do not are accommodated in railway offices, but they use box addresses and have separate telephones. While the committees are obligated to meet at least twice a year, no committee met fewer than three times during 1966 and one as many as sixteen times. Channels of communication between the committees and the boards are mainly through liaison officers appointed by the boards, though there are differences in practice locally.

Publicity

As mentioned earlier, the publicity activities of the transport area committees do not appear to be on the scale of those of the electricity and gas councils. That the committees are insufficiently publicised seems to be the held opinion in certain quarters, including the Ministry. On the other hand, there does seem to be more hesitation among some of the committees than is to be found among the councils in the two fuel industries in seeking greater publicity, apparently for fear of encouraging 'frivolous' complaints or of being inundated with complaints that could—and should—be dealt with by the appropriate railway offices without need of reference to the committees themselves. No finance appears to be made available to the committees specifically for publicity purposes, except to pay for the insertion of notices in various directories, and there is no discernible pressure from the committees for such provision to be made.

The addresses of the area committees are now obtainable from a variety of sources—main post offices, railway booking and enquiry offices, Kelly's Directory, main telephone directories, the Directory of Railway Officials and Year Book, the Handbook on Transport Users Consultative Committees and citizens' advice bureaux. Three of the committees favour display notices at railway stations giving information about themselves, but there is opposition to this practice from others. Only one committee appears to consider that the information given to citizens' advice bureaux, post offices and others

should include the names and addresses of committee members. The Central Office of Information has also provided a channel for disseminating information about the committees—a channel which one or two of the committees feel should be more fully exploited.

The most valuable single published source of information about the committees is the 'Handbook on Transport Users Consultative Committees' (see above), which is published by the Central Committee. This publication, which first appeared in 1963, provides a comprehensive description of the organisation and functions of the committees, together with some useful appendices, one of which gives in full the relevant Section 56 of the Transport Act of 1962. The Handbook has been circulated widely to local authorities and others interested, as well as being on sale to the general public (at 2s. a copy).

Publicity for the activities of the committees has tended, since 1962, to centre around their work in connection with railway closure proposals. These are, of course, matters which generally arouse local interest and, at hearings, the press, like the public, are allowed to listen to any oral representations made either by objectors to the closures or by the boards concerned. Some of the committees consider that publicity arising out of this currently predominant aspect of their work has done much to increase public awareness of their existence. Most of them seem to think that the response of the press, whether in regard to closures or to press releases and occasional press conferences in connection with their meetings, has been on the whole satisfactory and in some cases quite good. Additionally, some of the committee chairmen address chambers of commerce, rotarian gatherings and other audiences from time to time and occasionally make appearances on television.

It is difficult to believe, however, that some publicity ground has not in fact been lost during recent years as a consequence of the curtailed field of action of the committees and that the full impact of this has, so far, been largely obscured by the public's pre-occupation with closures. But whether so or not, there does not appear to be, in our view, any reason why the transport committees should be any less active in seeking publicity for themselves and their activities than the electricity and gas councils. The methods and resources open to the one are for the most part open to the other. Moreover, some of the possible ways of developing their publicity which we suggested for consideration in the chapter on the electricity and gas councils would seem to be not less appropriate in the case of the transport consultative machinery. These might include a short film

about the working of the committees; posters on the notice boards of large firms; a more developed programme of talks to local audiences; and closer liaison with members of parliament.

Complaints

Apart from representations arising in connection with proposed rail closures, representations, or complaints, about 'quality of service' matters are not subject to any prescribed procedure. Those with complaints (or suggestions) should be users of the service in question and not just any members of the public. Such users may include local authorities, residents' and rate payers' associations and suitably constituted local passenger associations, which are genuinely representative of a body of regular passengers. The committees are specifically empowered to disregard 'frivolous representations'.

Representations, however, whether in the nature of grievances, difficulties or proposals, should not be made to the area committees themselves unless the users concerned have first taken them to the appropriate railway board office (or also road transport office, in the case of the London area) and have failed to get satisfaction. The committees themselves are not complaints bureaux as such, but, as one of their functions, a 'second-line' recourse to which those with complaints can go, if necessary. The transport boards have their organisations for dealing with own complaints; and the effectiveness of these organisations in satisfying transport users with complaints is regarded as an important part of the boards' overall public relations. Even so, all too many complaints are in fact brought direct to the committees in the first instance and have to be referred back to the boards. One committee estimates that no more than about a third of the complaints reaching it have first been referred to a railway office.

Among the wide variety of complaints received recently by the transport committees, quite a large number is accounted for by complaints about unsatisfactory rail and bus connections. Bad time-keeping is another major cause of complaint, while others include overcrowding, lack of refreshments on trains and at stations, seat reservations, reductions in train services, curtailed passenger facilities at stations, taxi facilities, lighting on trains and delays in parcel and freight deliveries. In Appendix III (2) is set out a summary of 'quality of service' rail and bus complaints received by the London Area Transport Users Consultative Committee during the years 1964, 1965 and 1966.

Not all of the complaints received are, or can be, dealt with by the area committees themselves but need to be taken up with the Central Committee or, in the

case of the Scottish and Wales and Monmouthshire Committees, with the Minister. All but four of the committees seem to have had occasion to do this during recent years. The complaints concerned have included the inadequacy of alternative bus services to replace withdrawn rail passenger services; the reservation of seats on trains; the catering facilities on trains; the standard of passenger shelters at stations; the withdrawal of booking office facilities; and delays in parcel traffic. The Wales and Monmouthshire Transport Users Consultative Committee, concerned at the lack of co-ordinated timetables for rail and bus services, has itself taken the initiative and produced a very useful comprehensive timetable for its area.

The extent to which those who bring complaints to the transport committees are in the event satisfied—or can be satisfied—is always, in the nature of things, difficult to attempt to assess. The most objective example available has come from the London Area Committee and relates to the summary of quality of service complaints referred to above and reproduced as Appendix III (2). In this summary, it is reported that there are 52 cases which could be interpreted as inviting some form of specific action. In 27 of these cases, the Committee rejected the users' complaints on the grounds that they were not justified or open to any practicable solution; in 17 of them, action, wholly or partly meeting the users' point of view, was taken by the boards; in one, the action recommended by the Committee failed to secure the support of the Central Committee; and, in the remaining seven cases, investigations had not been completed. Beyond this example, no other definite figures are available. Other committees claim in general terms that the complainants were mostly satisfied, one putting the proportion at 50 per cent and another at 90 per cent.

Prospects for the Future

Implications of the Contracted Scope of the Committees

There is evidence of persisting discontent in many of the transport committees over the curtailment of the functions of the transport consultative machinery by the 1962 Act and a desire for the restoration of their earlier powers. Indeed, it could hardly be otherwise in view of the belittled importance of the role which they are now allowed to play. As one committee put it: 'the 1962 Transport Act severely circumscribed the work of the Committee to the detriment of its usefulness'. There is widespread concern, for instance, that they can no longer consider matters relating to bus services, especially as, in some areas, such as the Scottish area, public bus services account

for quite a large proportion of all bus services. Even in regard to their work in connection with closure proposals, which has been as successful as it has been important, a number of the committees hold it to be wrong that they should be restricted to the purely 'hardship' angle and not be asked for their views about other aspects involved. One of them feels that an area committee should be entitled to make a positive recommendation as to whether a line or a station should be closed or not. Also, on quality of service matters, a cause of disquiet to many of the committees is the fact that, in the case of reductions in rail services, they can deal only with objections which are raised *after* the reductions have taken place; on the basis, that is, of hardship experienced and not of hardship anticipated. Moreover, the committees, it is felt, are not used in a consultative capacity to the extent that they might be. It would help if they were to be consulted by the boards at an early stage in the formulation of policy.

Yet, once the objective of public transport policy became, as it did subsequent to 1962, that of progress towards commercial viability under the stimulus of increased competition between rail and road transport and between publicly and privately owned transport sectors, then the exclusion of certain matters (e.g. railway charges) named in the Act from the concern of the committees was in the nature of a logical development. For, as the various forms of transport have become more competitive, the more has each needed to organise itself to give the consumer what he wanted at the price he was prepared to pay if he were not to take his custom elsewhere. Driven by commercial exigency, the various boards have needed to develop modern programmes of consumer research and public relations and to adopt more market-oriented practices that were ever necessary before. The Railways Board, in particular, has moved far in this direction during the last few years and is becoming increasingly well briefed about railway users' views and needs and complaints. In the case of charges, for example, which before 1962 came within the committees' sphere of consideration, it is understood that these have now become fairly competitive the country over (except in the London area) as between the different forms of transport. Over short distances, railway and bus fares are reasonably comparable; while, over longer distances, though railway fares tend to be higher than bus fares, this is offset by the better facilities provided by the railways. Over longer distances, too, railway fares and air fares have become increasingly competitive. However, in the London area, it is not competition which finally determines fares but the Transport Tribunal, a body which has power to

make orders in regard to rail and bus fares in the area and is, in consequence, in a 'monopolistic' position. In this particular connection, therefore, it would seem that there is a job for the London Area Committee to do in regard to fares. Yet, at the present time, the Committee has in fact no connection whatever with the Tribunal. We take the view that not only should the Committee be consulted when fares are under consideration but that there should be a Committee representative on the Tribunal.

None the less, despite the impact of growing competition, leading in general to a better response to consumer demand and greater efforts to ensure consumer satisfaction, there remain all too many defects in the adequacy and quality of the various transport services from the consumers', or users', point of view. This is true of railway, not less than of other, transport services; and, as we have seen, it is with railway transport that the area transport consultative committees have been in practice almost wholly concerned since 1962 (except in the London Area, where the Committee is concerned with both rail and bus transport). Such defects in railway services as do occur, under present competitive conditions, seem for the most part to be attributable to three main causes: internal resistances of one sort or another (e.g. organisational, managerial, worker, etc.) to needed adaptations; the persistence of residual monopoly elements in some of the services provided, more particularly in certain localities; and neglect of the 'social' needs of certain categories of users in the interests of profitable operation (e.g. by discontinuing unprofitable but 'needed' services). These are defects which competition alone does not, and perhaps cannot entirely, eliminate—at least in the short term. But they do give rise to difficulties, inconveniences and often hardships for users and are thus very much matters for the transport committees to take up, even with their now much restricted brief.

A great deal of useful work is, of course, already being done by the committees in these fields. But it does seem to us that perhaps rather more might be done, since there appear to be gaps in the committees' coverage of 'complaints' areas (even allowing for the fact that complaints should only come to the committees after approaches to the railway authorities have failed to provide a satisfactory settlement). No doubt, the heavy involvement of the committees during recent years with railway closures has set limits to the attention that they have been able to devote to 'quality of service' matters. At the same time, the inadequacy of their public impact on railway users generally cannot be disregarded, since it must restrict the range of their contact with users

and with users' problems. The more positive approach to publicity for themselves and their services, which we have already recommended, would, therefore, seem to be a much needed development. Another needed development (and one which the Minister of Transport has now proposed) is that of making the committees more representative of a wider cross-section of user opinion than they are at present, in particular of those categories of railway users, such as the aged, the disabled, schoolchildren, shoppers and the like, whose 'social' needs have not always been given the emphasis they merit when the retention or closure of certain lines has been under consideration.

The full impact of the diminished scope of the transport committees' work has, however, still to come. So far, it has been largely masked by their predominant involvement in work on rail closures during recent years. But, once this programme has been completed, it seems only too evident that many, if not most, of the committees will be left with only a fraction of the work that used to come their way: only, in fact, with what amounts to little more than the 'small change' of railway users' problems. Even if their effectiveness in this limited field can be enhanced, as suggested in the previous paragraph, by more publicity and the 'social' aspect of their work extended by making them more representative of users whose needs are apt to suffer in the interests of profitable operation, they will still be limited to activities which are essentially only residual. As such, these activities, valuable as they are in themselves, cannot add up to an adequate substitute for lost responsibilities and are unlikely either to restore the earlier importance of the machinery or to enable it to play the part on the transport users' behalf for which it was originally designed. If no more than this is to be left to the committees, once work on closures is at an end and on the assumption that the railways may be expected under competitive pressure to become increasingly efficient in the services they provide, then it is for question whether the machinery in its present form is suited to so diminished a role.

Pointers to a Changing Role

There is, however, another development in prospect, which, because of its cardinal importance to transport users, seems most likely to give rise to a new and growing need for the services of the consultative machinery. This is the development of co-ordination between the competing forms of transport on the basis of some degree or other of integrated planning. It is of limited value to users to have available several more or less efficient, and competitive, forms of transport if there is lacking any adequate user-oriented co-ordination between

them. If, for example, to travel from A to B, the user needs to travel on trains, buses and aircraft, each in itself operating efficiently and to his satisfaction, which are otherwise so unco-ordinated in their timetables that he finds himself involved in long delays and perhaps nights at expensive hotels in the process of changing from one to the other, then he is not being very well served. To a certain extent, of course, it will pay the boards concerned to arrange voluntarily for some degree of co-ordination between their respective timetables in order to attract and keep the custom of this category of traveller. But this will tend not to be carried beyond the point at which any resultant increase in costs more than offsets the estimated advantage of retaining or enlarging the element of custom affected. Beyond this point, co-ordination will be achieved only in so far as there is some authority both to contrive and, if necessary, to enforce it. So, too, with co-ordination in respect of fares and other aspects of service.

This brings into focus the whole question of national transport policy. And at the present time, this is still in a state of flux, its future shape still uncertain. The Government's White Paper on 'Transport Policy' (Cmd. 3057), which appeared in July, 1966, gives some broad indications as to the pattern of general development under consideration, and foreshadows the setting up of authorities with co-ordinative responsibilities. But it is by no means yet certain what final form any impending new transport legislation will eventually take. The White Paper argues the case for a main transport system which is centrally planned and for which a co-ordinated investment programme will need to be worked out. It also emphasises the need within the regions themselves for 'the re-organisation and integration of public passenger transport services to enable them to meet more effectively the changing demand brought about by the growing use of the private car'. In some of the conurbations, the local authorities are already considering the setting up of conurbation transport authorities to integrate all their passenger transport services. But, though such authorities may become part of the picture, there is still need, it is pointed out, for rationalisation on a wider regional basis if better connections and interchange facilities between services, shared timetables and joint information facilities are to be provided.

The position at the time of writing is that with the co-operation of the Regional Economic Planning Councils, the Minister of Transport has, as a short-term measure, recently set up passenger transport co-ordinating committees for each region on a voluntary basis. Later, these may be supplemented by

transport authorities responsible for all public passenger transport services in an area. These committees will co-operate with such co-ordinating committees or transportation study steering committees as are already established within conurbations and their membership includes representatives of the regional councils, local authorities, local transport operators, trade unions, the traffic commissioners and transport users. Their task is an advisory one only. In the main, they will study local transport arrangements and advise on how to provide a more effective and co-ordinated service by public transport; they will also advise on such related matters as traffic management measures to assist public transport, on the siting of car parks in relation to public transport facilities and on arrangements for interchange between train and bus or between different bus services.

The significance of this development from the point of view of the existing transport consultative machinery is that the transport users committees are represented on each of these co-ordinating committees—as it is very desirable, of course, that they should be. (The South East Region Passenger Transport Co-ordinating Committee also includes among its members the director of the Consumer Council, serving in a personal capacity but, in effect, to represent the consumer interest in general in the region as distinct from that of the transport users only. It is the only co-ordinating committee to have such a general consumer representative on it.) Though it is too early as yet to be certain how this will effect the scale and scope of the work of the transport users committees, it does seem likely that, arising out of the activities of the co-ordinating committees, a growing volume of representations about 'quality of service' matters will come their way. Moreover, there will be need for the transport users committees to study and arrive at their own consumer viewpoints on the various schemes for improving co-ordination of transport, as these are evolved. Sometimes, no doubt, they will find themselves opposed to some of the schemes and will need to represent their views to the Central Consultative Committee and perhaps, through it, to the Minister.

If, however, it is eventually decided to set up transport authorities, as distinct from advisory committees, whether just for conurbations or on a wide basis, with the power of enforcing plans for greater transport co-ordination, then the role of the consultative committees should become, as it will then certainly need to become, very much more important. For such authorities, having the powers to enforce their decisions on users as well as on operators of transport, will, in effect, be in the position of mono-

polists, subject only to the Minister and to such pressures as can be brought to bear by those whom their decisions affect. Of these, the users, scattered and unorganised, have least scope for exerting pressure. For the sanction of competitive choice, which, as we have seen, users are now able increasingly to exercise as between different forms of transport, will be of little value to them here. It should, therefore, we suggest, as a development not less logical than that which led to their deprivation of powers under the 1962 Act, fall properly to the consultative committees to represent the users on any such transport authorities and to have a say in the formulation of these authorities' plans and proposals. What is more, if the committees considered that the users' interests were being insufficiently regarded, they would have, in reserve, their sanction of approach to higher authority as a countervailing pressure to exercise on the users' behalf. This development, if it comes about, would do much to restore the pre-1962 importance of the committees and open up to them an expanding new field of work in which they would be able to further transport users' interests and provide a corrective to any exercise of monopolistic power against these interests. Necessarily, at this point of time, the issue is still a matter of speculation. None the less, we believe that, as a general proposition, any moves towards a more authoritarian system of co-ordination of public transport facilities must add greatly to the need of transport users for the services of the consultative machinery. Moreover, they must underline, too, the necessity for again widening the range of the machinery, so that it can come both to include the consideration of matters (including charges, in so far as these come to be influenced by the new authorities and cease to be determined by competition) excluded from their scope by the 1962 Act and to embrace all forms of public transport—road, rail, water and air.

To the extent that future transport policy can be foreseen, it should also, we believe, lead to an enhancement in the importance and scope of the work of the Central Consultative Committee. Certainly, in our view, the Committee should not remain, as at present, virtually limited in the range of matters it may consider to those concerning rail services, but should be empowered, not less than the area committees, to deal with those arising from public road and air services. This is not to suggest that the work of the Committee in connection with rail service is not important. There is a close liaison between the Committee and the British Railways Board, and also between it and the London Transport Board, and we understand that it is frequently consulted by these

boards about proposed improvements or changes in passenger services. But, if the Committee is to represent, centrally, the interests of public transport users, it is difficult to see how this can be satisfactorily done unless its powers of consultation and representation extend to all forms of public transport. Also, in so far as the area committees become increasingly involved in local transport co-ordination matters—if in the event they do—then inevitably an increasing amount of work in this connection can be expected to filter through to the Central Committee, some of which will require to be taken up at a ministerial level. The Committee, we consider, should again be empowered to consider charges and be entitled to be consulted when increases in charges are being proposed. Not the least of the reasons for this is the need to offset possible weaknesses in competitive pressure on the determination of charges. But, over and above this, if, as is indicated in the White Paper, public transport is to be planned on a national basis, this will result in a whole new area of user interest becoming exposed, which will require the cover and support of a suitably representative user body. Given an extension of its scope to cover all forms of public transport, the present Central Committee would seem to be the obvious body for the purpose. As a focal body for representative transport users' opinion at a national level, it would then be well equipped and well poised to be consulted by the Minister, as well as by the boards, on transport policy developments, bringing such pressure to bear as it judged fit in order to ensure that the users' stake in the plans evolved did not go by default.

In this study of the transport users consultative machinery it has not been possible, as we stated at the outset, to deal with it as exhaustively as we would have wished. Moreover, in view of the policy uncertainties which lie ahead over the whole field of transport, a sizeable element of speculation has necessarily had to enter into our discussion. Yet, the broad picture is not without its clarifying pointers. From them has emerged the conclusion that, if what appear to be likely policy developments eventuate, then the need of transport users for the services of the consultative committees is going to be greater, and not less, in the future than in the past. But, it will be a need that will be associated with a substantial change of role. And the defining feature of this new role will be its tendency to be less 'vertical', in the sense of being concerned with the user shortcomings of individual forms of transport, now increasingly in competition with one another; and more 'horizontal', in the sense of being concerned with problems of co-ordination and development across the whole field of public transport.

Chapter Six

Some observations on the role of the Consumer Consultative Machinery

Having studied in some detail the consultative machinery in the four industries of electricity, gas, solid fuel and transport, and advanced in the course of the text a number of suggestions as to how we think its effectiveness might perhaps be enhanced, it now remains to look at the machinery as a whole in more fundamental terms and to attempt to distill from the more detailed descriptions and analyses of previous chapters the salient principles which govern both its purpose and its system of operation.

The Nature of the Consumer Consultative Role

The purpose underlying the setting up of the consultative machinery in these four industries—as it was stated at the outset and has been developed in the course of the study—is essentially a simple one. In its basic terms, it is to meet the need of the consumers concerned for a means of bringing their influence to bear upon the industries and also, if necessary, of securing redress against them. That there should exist this need of the consumers, however, derives, in turn, from the existence of limitations on their freedom of choice—the consumers' most compelling sanction against a supplier. For them, this freedom is all but unavailable, or at most only partially available. And this for three reasons—one of them associated with the consumers themselves, one with the nature of the products or services and one with the position of the suppliers.

There is, first of all, little freedom of choice for these consumers between whether to buy or not to buy, because the products and services in question—electricity, gas, coal and transport—have become virtual necessities in the modern world. Secondly, choice between one product or service and another is restricted by the fact that they are mostly only partial substitutes or substitutes only over a period of time. And, thirdly, choice between one supplier and another for most of the particular products or services was eliminated when the industries themselves became nationalised, leaving the state as the only supplier. Thus, each of the industries is in a position in relation to its consumers that is to a greater or lesser degree 'monopolistic', depending on the extent and 'mix' of its threefold insulation from the competitive forces of the market. It was to arm these consumers with a countervailing sanction with which to oppose an undue exercise of such mono-

polistic—or imperfectly competitive—power against them that the consultative machinery was originally devised. Its value to the consumers, therefore, must hinge on the degree to which in each industry there is such a monopolistic position (in the threefold sense of above) to be met and, in so far as there is, its effectiveness in meeting it.

So far as the supply position is concerned, the three nationalised fuel industries have each a complete or nearly complete monopoly over the generation or production of their own particular fuels. (The electricity industry has to compete with a certain amount of generation by private plants and the coal industry with gas coke and manufactured solid fuels.) But, whereas the electricity and the gas industries also have monopolies over the distribution of their respective fuels to the consumer, the distribution of solid fuel is almost wholly in the hands of private merchants in competition with one another. Furthermore, the retailing of electricity and gas appliances and equipment is to a large extent undertaken by the electricity and gas industries themselves through their local boards, though against growing competition from private retailers. Of the three fuels, electricity now has a virtual monopoly so far as use for lighting is concerned; on the other hand, for heating purposes, there is strong competition between electricity and gas and, to a lesser, and decreasing, extent, coal. But the competition for heating purposes is effective, so far as the individual consumer is concerned, only at the time of installation or purchase, since a heating system or an appliance is not likely to be changed, once it has been installed or purchased, until some years, probably many years, have elapsed.¹ By contrast, public transport is, as

¹ Oil fuels, of course, constitute a fourth competitor in the heating field, along with oil-burning equipment. Since, however, the suppliers are the large private oil companies, the consumer position in regard to these fuels lies outside the scope of the present study. The equipment, like that for the use of the other three fuels, is competitive only at the time of installation or purchase. On the other hand, the different oil fuels themselves, being both readily substitutable and supplied by different and competing oil companies (e.g. Shell, Esso, etc.), are highly competitive as between one another. In so far as the oil companies, tacitly or otherwise, were to seek competition between themselves as an oligopolistic basis, whether as regards the pricing range of their fuels or in some other way, then the consumers' position would become correspondingly weakened by virtue of a reduced freedom of choice. If the need to be carried beyond a certain point, then, gives the case for the consultative machinery in the nationalised fuel industries, a similar case might become arguable for some suitable variant of the consultative system to be developed in the oil industry.

we have seen, in a rather different position. For, apart from the several separately provided forms of public transport, each competing with the other and no one of them, except the railways, a monopoly in its own field, there is strong—and growing—competition from private road and also air transport. But what is more important, however, is that the various forms of transport are much more readily substitutable one for the other than are different systems of heating. A journey is usually at most a matter of hours and not, like a heating system, a commitment for years. Consumer decisions have therefore to be taken much more frequently, giving consumers that much more scope for exercising their sanction of choice.

It becomes evident, therefore, that the electricity and gas industries are, overall, each in strongly monopolistic positions in relation to their consumers, notwithstanding the keen competition between them; that the solid fuel industry is less so; and that public transport is becoming increasingly competitive as between its various forms and with private transport (though this may soon be qualified in some degree by new developments in the field of co-ordination). On this assessment, there would seem to be a more clearly delineated and needful task to be performed by the electricity and gas consultative organisations than by those in the solid fuel and, still more so, in the transport industries. This no doubt goes far to account for the more elaborate and more active machinery to be found in the two former industries, as also (apart from the special matter of railway closures) for what appears to be the insufficient use, and the much curtailed role, of the transport users consultative committees since 1962.

If, however, the purpose of the consultative machinery is to provide the consumers, in default of the option of being able to withhold or transfer their custom, with a substitute means of influencing the operation of monopolistic power, how does the machinery enable this consumer influence to be exerted? Although the answer to this question will have emerged piecemeal and by implication from the more detailed approaches of earlier chapters, it is desirable to develop it explicitly here in more general terms.

Three Significant Features of Consultative Organisation

There are, we suggest, three features of the machinery we have been studying which are of especial significance for its effective use on the consumers' behalf. One of these is the degree to which the consultative bodies are representative of cross-sections of relevant and informed consumer opinion, thus enabling them

each to speak with a collective voice, whether about matters arising out of individual complaints or in connection with more general matters, and be equipped to enter responsibly into consultation with the appropriate decision-making authorities. A second is the extent to which the bodies are organised at levels which correspond to those of the decision-making authorities with whose policies and practices they are most directly concerned, so that consultation with such authorities can be on a basis of relative equality. The third concerns the right of the consultative bodies to pursue the consumers' case, in default of response to representations at their own level, by means of representations to higher level decision-making authorities (e.g. the Minister), thus invoking the sanction that, in effect, lies in reserve behind all of their efforts on the consumers' behalf.

It is these three features of organisation which seem to us to be the key factors in determining the scope for effective action by the consultative machinery. How the four separate structures of that machinery fare in these three respects—which must to a large degree categorise their usefulness to their consumers—will have emerged in the course of the previous three chapters and not need to be dwelt upon here. Notably, however, in regard to the second of them, the electricity and gas consultative councils would seem to be in the best position, being organised on the same decentralised basis, and at the same level, as their respective area boards, even though, as we have seen, there seems to be something of a consultative vacuum at the national level in both industries. By contrast, the local transport users committees bear no relation, at least in their boundaries, to the regional railway boards, although the Central Committee, being a national body, is at the same level as the four national boards with which it deals.

Quite apart, however, from the existing position of the consultative bodies in regard to these three features of organisation, there are two general questions, stemming from the second and third of the features, that need to be raised. One of these is whether the hierarchical patterns of the consultative structures are now losing some of their former correspondence to the decision-making patterns of their industries, as these latter change, and need, in consequence, to be made more adaptable so as to respond to such changes. The other is whether there are any further, largely untapped, reserves of 'higher' reference to which the consultative bodies can—and should—turn, if the need arises, to uphold the interests of the consumers they represent. These are both questions which seem to us to have

important bearings on the future development and effectiveness of the consultative machinery and need to be looked at, if only briefly, at this final stage of the present study.

Responsiveness of the Consultative Machinery to Change

In raising the first of these questions, relating to the responsiveness of the whole machinery to change, we are doing so rather in order to open it up to future discussion than to attempt ourselves to provide answers, at least other than those we have been led to suggest in earlier chapters. For it is a question that, in our view, now needs to be discussed and in the most comprehensive and authoritative way.

Except to a limited—and not very helpful—extent in the case of the transport committees, the consultative arrangements in the four industries concerned have remained virtually unchanged for twenty years. Yet these twenty years have been years of substantial and far-reaching change—in the scale and pattern of consumer demand, in technological development in the industries themselves and in the financial and other policies of successive governments. And the prospect ahead is of still more change. If the coming of nuclear power and the discoveries of natural gas are likely to prove the most dramatic and transformative in impact of the new developments, they are not the only ones that will leave their mark. Less dramatic but little, if at all, less transformative are the new management techniques and systems of control that the nationalised industries, like other large industries striving for greater efficiency and productivity, are going to need to introduce to an ever-increasing extent. Perhaps, too, the present, or future, governments will turn to different financing concepts for these industries, shifting—it may be either way—the balance of the cost burden as between consumers and taxpayers or between current consumers and future consumers. And, moreover, the prospect of change is likely to be a continuing one and not limited to the next five or ten years. For the very character of the now emerging milieu of cumulative innovation is such as must be inseparable from a tempo of change which is more likely to increase than to slow down.

Inevitably, this has led, and is leading, to a re-patterning in the various industries of their centres and levels of decision-making—including some of the decision-making which most directly affects the interests of their consumers. It is because of this that we consider it timely to raise the question as to whether the consultative machinery in these industries is not now to some extent being passed by, leaving it in danger of becoming less and less geared

to bring pressure to bear on the consumers' behalf where it is needed most. Quite apart from certain aspects of this problem that have been drawn attention to earlier (e.g. the lack of adequate *national* consultative facilities in the electricity and gas industries), it seems not unlikely that, if a thorough-going official review of the machinery in the light of changes that have, and are, taking place in the structures of the industries concerned were to be undertaken, it would disclose a need for some substantial organisational adaptations.

As the machinery exists and functions by statute, any such adaptations, if to be made, would, of course, require further legislation. In this event, we suggest that, having regard to the now more fluid and faster-changing environment in which the machinery must work, any new enactments which merely provided for such adaptations as were shown to be necessary would not be enough, since this would only serve to 'freeze' the machinery in a new form and thus lead to the whole problem coming up against later. What, additionally, it seems to us such enactments must provide is for a degree of *self*-adaptation, not present in the existing structures, to be built into the revised machinery. This way, the machinery would acquire a measure of organisational, as well as purely operational, autonomy, which, we suggest, it is now time for it to acquire, if it is to function to full effect in circumstances so very different from those obtaining when it was first set up. Though it would be inappropriate to attempt to pursue this suggestion further here, we have raised it as a principle of approach which we consider ought to enter into any review that may be undertaken of the existing legislation governing the consultative machinery.

Two Ways to Greater Consumer Influence

The second of the general questions which we have to raise concerns the right of the consultative bodies to represent the consumers' case to higher authority. As this right is a key component in the bargaining armoury of these bodies, it is important that, should the need arise, it should be made use of to the full.

The various representational procedures statutorily open to the consultative bodies in the four industries have already been described and discussed and a number of suggestions made as to how we think that some of the existing arrangements might perhaps be improved. As laid down, however, the highest level to which these bodies can formally take their representations is to the Minister of Power (or to the Secretary of State for Scotland) in the case of the fuel industries and to the Minister of Transport in

the case of the transport industry. If, therefore, support is withheld at this level, then there remains no further official move open to them, should they still consider they have any case to pursue.

Quite apart, however, from our suggestion in chapter three that there was need for an independent tribunal to which complaints requiring reference beyond the minister concerned might be taken for final settlement, there are, we suggest, two further *informal* ways in which the consultative bodies could—and, if need be, should—exercise pressure on behalf of their consumers, when more formal procedures no longer avail. One of these is by winning the support of public opinion through publicity specifically directed to this end; the other, by winning the support of members of parliament.

Through the Support of Public Opinion

It does seem to us that the consultative bodies generally do not seem fully to recognise how potent an instrument they have available to them for winning public support, when they have a case of substance to fight, in the form of appropriate publicity. In this present age of mass communications, publicity is peculiarly adapted to press for what, in effect, is the essentially mass character of at least the major consumer requirements. It is true that certain chairmen of consultative councils have appeared on television to protest against increases in electricity or gas charges and others have been reported in the press after making speeches criticising the financial conditions under which their industries have to operate. By and large, however, the kind of publicity which the councils and committees normally seek is, as we have already seen, primarily descriptive in character, dealing with what they can do and what they are doing to serve the consumer, so that they themselves may become better known and thus be able to provide better service. Only rarely, so far as we have been able to discover, do they use publicity that is overtly persuasive with the object of harnessing public support to a specific or general consumer interest. As a result, the image of themselves that they tend to put over is one that is largely judicial and only occasionally partisan. And there is, of course, good reason for this. A great deal, perhaps in volume the bulk, of their work does involve a judicial attitude in dealing with complaints and in balancing the arguments as between consumers and boards. Moreover, in pursuing matters of policy with the boards, it is quite natural for the consultative bodies to wish to do what can be done in a climate of co-operation, assisted by a mutuality of confidence, rather than by resorting to a mobilisation of outside pressures. Generally, too, it is likely to be the more rewarding way.

From time to time, however, problems do arise which call for a recourse to more combative and publicly proclaimed pressures than can be brought to bear in private around a conference table. Quite often, these are problems in connection with which the boards themselves have relatively little scope for the exercise of independent discretion, being themselves circumscribed by other pressures from outside. Demands for increased wages, financial obligations to be met, increased prices for essential supplies or equipment—these and other such externally imposed conditions necessarily have the effect of narrowing a board's room for manoeuvre. This is often evidently the case with the electricity and gas area boards, when they have to raise their tariffs. They would no doubt prefer not to raise them, but find that they have little option open to them. In this sense, they are, in effect, 'on the same side' as their consultative councils. It would seem, therefore, that it is more often—though by no means always—when boards are *unable*, rather than unwilling, to meet the consumers' case that the consultative bodies have need of some further recourse, over and above their formal right of approach to higher authority, if they are to become more effectively combative on the consumers' behalf. And they may also need one when they feel they have good grounds for opposing, or seeking a modification of, government policies which they judge to be inimical to their consumers. The harnessing of public support by means of publicity is just such a recourse and one which, we consider, the consultative bodies should not hesitate to resort to when, in their view, they have a case of sufficient merit to pursue. For them to do this would, we believe, not only give greater weight to the representations they make to higher authority but would add greatly to their public reputation and to their meaningfulness to consumers in general.

Through Support in Parliament

The other informal way open to consultative bodies for increasing the consumer pressure which they can bring to bear, when they feel it to be called for, is through efforts to win support among members of parliament.¹ Effective publicity, leading to the sup-

¹ It is of interest that, under the Iron and Steel Act of 1967, if the Minister decides not to give any directions to the Corporation on any matter arising out of any consultation, report or representation made to him or to the Corporation by the Iron and Steel Consumers' Council (so-established under the Act), he must 'lay before each House of Parliament a statement of that matter and of his reasons for not giving directions thereon' (Iron and Steel Act, 1967, Schedule 3). This provision has the effect of giving statutory emphasis to the Minister's responsibility to Parliament for the consumers' statement in respect of the nationalised industry. A similar provision might with advantage be inserted into the relevant sections of the statutes governing the consultative bodies in the four industries dealt with in this study.

port of public opinion, will certainly help in this; but it is only through close and co-operative contact with members of parliament, and, when necessary, through the active canvassing of their help, that this support is likely to be won. Moreover, as consumer interests are apt to be specific (e.g., fuel, transport, etc.) rather than general, members of parliament supporting a particular case need the backing of adequate and authoritative briefings. And it is here that the consultative bodies are uniquely equipped to help with cases affecting their own consumers.

The main initiative for gaining consumer support in this quarter must, so far as the nationalised industries are concerned, come from the consultative bodies themselves. By building up better liaison with members of parliament and providing them with authoritative briefings when required, by more publicity for representations made on important matters and by the development of collective attitudes on national issues affecting their consumers, these bodies can themselves do much towards winning support in parliament, when the occasion for doing so arises. And the fact that they were prepared to do so, and were known to be prepared to do so, would, we suggest, have the effect of enhancing their influence with the government, with their industry and with the consuming public.

The Statutory Framework

To implement many, if not most, of the suggestions we have put forward in the course of this study must involve changes of one sort or another in the statutory provisions governing the organisation and functioning of the consultative machinery in the four industries. Since, however, the provisions have for the most part remained substantially, and in the case of gas and coal completely, unchanged over twenty years, it seems to us that the time is now ripe for a comprehensive official review of the machinery to be carried out, leading to a revision of the framework in the light of present and foreseeable future conditions.

Should this be done, there are two general respects in which the framework needs, in our view, most to be changed. One of these is in the direction of greater independence of organisation and action for the consultative bodies than some of them appear to have under present arrangements, especially in connection with matters of national policy. (That some of the more progressive bodies, notably in the electricity and gas industries, appear in fact to have developed their functioning beyond what a literal interpretation of the statutes would indicate is in itself a sign of healthy growth, yet one that calls,

none the less, for the statutes to be revised to suit the changed conditions of today.) The other, which we have discussed earlier in this chapter, is in the direction of greater self-adaptability for the machinery in each industry, so that it may itself adapt to changing requirements, without need for the laborious and, in the nature of things, infrequent remedy of new legislation.

The Consultative Machinery as a Factor in Productivity

As a concluding point, we think it important to refer, very briefly, to an aspect of the consultative machinery that is apt to be overlooked, yet one without which the overall picture cannot be complete. This is its significance for the national economy in the connection of being a contributory factor making for increased productivity in the industries in which it operates.

So far, we have been looking at the machinery solely in terms of its service to consumers, since this was our principal purpose in undertaking the study. In the present chapter, however, we have come to see it, distilled to its essentials, as a means for providing a countervailing mobilisation of consumer influence with which the confront the exercise of monopolistic or near-monopolistic power by the boards of the nationalised industries concerned: as in effect, the counterpart, in sustaining the consumers' influence under monopolistic conditions, of the consumers' freedom of choice in the market, in doing the same thing under competitive conditions. To the extent that the machinery can succeed in doing this, it not only serves the consumers themselves but, by the fact of 'strengthening' them in relation to the industries in question, creates a situation which tends to leave the industries with little option but to make themselves more productive. Pressed, as these nationalised industries are, by demands, on the one hand, from their workers for increases in wages and, on the other, by the Government for a minimum return on investment, they can meet these two sets of demands, each apt to be unyielding, only either at the expense of the consumers or by becoming more productive. So long as the consumers themselves are 'weak', then to make them pay in one way or another, whether by higher charges or poorer service, is generally the easier way out. If, however, through the mediation of consultative machinery, the consumers can acquire some of the 'strength' enjoyed by consumers in a competitive market, then the only recourse remaining to the industries is that of greater efficiency and greater productivity.

It can be seen, therefore, that the consultative machinery in the industries we have been examining

—and indeed, for the same reasons, appropriate variants of the machinery, if they were to be devised and set up, in other monopolistic or near-monopolistic industries, whether public or private—has an important part to play in helping the consumers to exercise a *positive* influence upon these industries in the direction of greater productivity. And, in doing this, it must serve also to underline the fact

that these consumers, being integral elements of economic processes, are not just passive recipients of the goods produced or services provided, needing only to be protected or given redress, but, like consumers making their choices in a competitive market, active participants in shaping the futures of their industries, with all the attendant responsibilities that this entails.

Chapter Seven

Summary of Conclusions and Suggestions

General Conclusions

Our study of the consumer consultative machinery in the four nationalised industries of electricity, gas, solid fuel and public transport has led us to a number of general conclusions, the main ones of which are given below.

Electricity and Gas Consultative Councils

1 Within limits, the electricity and gas consultative councils have done, and are doing, a good and valuable job in their localities on behalf of their consumers.

2 Too little is known about the councils and their work by the consumers whom they exist to serve. Partly, this seems to be due to publicity shortcomings; partly, to inadequate local identifiability, especially of the (local or district) committees. As a result, what the councils are actually able to do for these consumers is less than what, potentially, they are capable of doing. On the other hand, the relatively small numbers of consumers who have had occasion to use the councils have, in general, been satisfied with the outcome and would go to them again.

3 The lack, in each industry, of any central consultative organisation constitutes a major weakness in the machinery which, notwithstanding the regular meetings of chairmen, leaves it inadequately equipped at the national level to be consulted or to make representations about the growing range of policy matters of import to consumers.

Domestic Coal Consumers' Council (and the Approved Coal Merchants Scheme)

4 The Domestic Coal Consumers' Council has done, and is doing, a lot of useful work for the domestic consumers of solid fuels; but, due largely to inadequate publicity, as well as to a lack of regional machinery, very little of this has become known to these consumers in general.

5 The Council's independence and consumer effectiveness must be weakened by a membership which includes representatives of both the suppliers and the retailers of solid fuels, in addition to those of the consumers.

6 The fact that the Council, as a 'consumers' rather than a 'consultative' body, lacks independent consultative links with the industry (other, that is, than through the Minister or through the industry's

representatives on the Council) must detract from its effectiveness on the consumers' behalf.

7 The Approved Coal Merchants Scheme, which now serves very largely to offset the Council's lack of regional machinery of its own, itself provides an effective system, well suited to the retailing structure of the industry, for helping the consumers by improving the standards of solid fuel retailing. But it, too, is too little publicised and known about.

8 The links of both the Council and the Scheme with local domestic consumers of solid fuels through independent consumer representatives are less complete than would appear to be desirable.

Transport Consultative Committees

9 There is very little awareness of the existence of the transport consultative committees among transport users, not least due to poor publicity arrangements.

10 The work of the local transport users committees in connection with the 'bardship' aspect of rail closures has been, in general, both successful and useful.

11 The overall usefulness of the committees to transport users has been sharply curtailed during recent years, due to the severe restrictions imposed on the scope of the transport consultative machinery by the Transport Act of 1962.

12 Probable developments in the field of transport co-ordination seem likely to provide a new role for the committees and one which should enable them to give much more effective, and needed, service to transport users than, due largely to their present restricted scope, they are able to do at the present time.

General

13 The statutory provisions governing the various consultative bodies we have been studying appear, in the light of modern conditions, to be in need of some substantial revision, both in specific and in general respects.

Suggestions

Deriving from these broad conclusions, we have put forward in the text a considerable number of suggestions for improving and strengthening the consultative machinery in the four industries. The principal ones among them are set out below.

Electricity and Gas Consultative Councils

1 *Membership.* In order to allow of greater flexibility in adapting the membership composition of the electricity and gas consultative councils to suit local circumstances, the present statutory requirements governing the proportions of that membership to be drawn from local authority sources should be adjusted, for both the electricity and the gas councils, to a lower limit of one-fifth and an upper limit of three-fifths of the total (Pages 14-15).

2 *Secretaries.* The appointments of council secretaries in both industries should all be on a full-time basis. The pay and prospects attaching to these appointments should be improved, not least as a safeguard against possible recruitment difficulties in the future, and adequate supporting staff always provided. The secretaries of the gas councils should hold an annual conference (or some similar convening arrangement) on the lines of that held by the electricity council secretaries. (Pages 16-18).

3 *Offices.* To underline the appearance as well as the fact of independence, the offices of consultative councils should be quite separate in location from those of area board headquarters or showrooms. Moreover, they should, so far as possible, be in good positions, readily recognisable and adequate in size, layout and equipment. (Page 19).

4 *Financing.* Also in the interests of independence, the financing of the councils should be the responsibility of the Minister of Power and not of the electricity and gas industries, as is the case at present. In default of this, however, financial provision for the councils (excluding the two Scottish electricity councils) should come wholly from, or through, the Electricity Council (as to a very large extent it now does in the case of the electricity councils in England and Wales) or the Gas Council, as the case may be, and not direct from area boards (as is at present the case with the gas councils). When and where needed (e.g. for office accommodation, members allowances, staff provision and emoluments and publicity), funds should be made available on a rather more generous scale than appears to be done at present. (Pages 19-21).

5 *Complaints.* In regard to arrangements for dealing with consumers' complaints, the wording of the relevant subsections of the Electricity and Gas Acts should be amended so as more specifically to cover than at present the supply, fitting and servicing of appliances by area boards as matters about which it is proper for representations to be made to the councils (pages 21-22). Moves should also be made towards concerting arrangements between private suppliers and board suppliers of electricity and gas equipment for dealing with the complaints of those

consumers, not at present covered by the consultative councils, who suffer from the selling of defective equipment and the avoidance of servicing responsibilities by certain private suppliers (pages 25-26). A standardised system for collating and publishing statistical records of complaints received and dealt with should be adopted by the councils in each of the two industries (page 23). For the representation of complaints above area board level, the most satisfactory procedures would seem to be that:

- (a) the councils should take the complaints in the first instance to either the Electricity Council or the Gas Council (which the electricity councils in fact do, but the gas councils do not); and, if this fails to satisfy, then to the Minister of Power (or, in the case of the two Scottish Electricity Councils, direct to the Secretary of State for Scotland);
- (b) if the councils are dissatisfied with a ministerial ruling on a complaint, there should be available to them the services of an independent and appropriately constituted tribunal to which they might have recourse for a final judgement;
- (c) if a complainant, having failed to obtain the support of his consultative council, wishes himself to pursue his complaint above area board level, then (and in the absence of the additional facility suggested at paragraph 9 below) it would be more appropriate for him to go direct to his local member of parliament than to the Electricity Council (which electricity complainants can at present do) or to the Gas Council (which gas complainants cannot do); and for the member of parliament, at his discretion and after reference to the consultative council concerned, to take the matter up with the industry, the Minister or, as need be, with any final tribunal that might be set up as suggested in (b) above. (Page 25).

6 *Policy Consultation and Representation.* In the field of policy consultation and representation (and whether or not the suggestion at paragraph 9 below were to be adopted), more collective initiatives on a national basis should be taken by the councils in both industries in connection with policy matters of general consumer concern, following the lines of that taken recently by the electricity council chairman in their letter to the Minister about the consumer implications of certain aspects of the financial obligations at present bearing upon the industry. It would also be advantageous, in respect of policy matters, if arrangements were to be made for gas council chairmen to hold regular meetings with the Gas Council (as the electricity council chairmen do with the Electricity Council), as well as with the Minister;

and also to meet together on their own to concert collective viewpoints to be taken up with the Council or the Minister. (Page 31).

7 *Public Awareness.* The need, borne out by our field survey, for securing greater public awareness among the consuming public of the councils and their work might be met in part by means of:

- (a) notices about the councils being displayed, where it can be arranged, in the offices and workshops of local industries;
- (b) more talks and lectures by council chairmen, members, secretaries and others, by way of educating local consumers in the use of the councils and of encouraging them to put forward their own ideas and suggestions;
- (c) regular council press conferences (e.g. when the annual reports are published), linked to some hospitality;
- (d) the production of a short film for the councils of each industry for wide showing throughout the country;
- (e) a more effective utilisation by the councils of their annual reports as a medium for an attractive presentation of the work that they have been doing for their consumers, the reports themselves to be published separately from, and ideally independently of, the annual reports of the area boards;
- (f) concerted efforts by the councils in each industry to secure wide publicity for any stands taken collectively on the consumers' behalf on issues of national policy;
- (g) closer liaison by the councils with members of parliament in their areas, in order to develop what is a potential for useful co-operation between themselves and these members, having regard to the latter's responsibility for the general consumer interests of their constituents. (Pages 34-36).

8. *Local Fuel Consumers Committees.* As a means to render identifiability by local consumers, and thus to greater public awareness, of the local or district committees of the councils, and in view of the predominant concern of these committees with consumers' complaints as distinct from matters of policy, there should be initiated a gradual move towards replacing the separate electricity and gas committees, in the same or similar areas, by joint 'local fuel consumers committees', with established and well located offices and composed of representatives of local electricity and gas consumers (appointed, as now, by, and with access to, their respective parent consultative councils) and also local solid fuel consumers (probably appointed by the Domestic Coal Consumers' Council). While the suggested new

joint committees would be equipped by their 'mixed' membership to deal with those fuel problems of local consumers which were of a common or complementary character, for which no provision exists at the present time, those problems which were specific to the particular industries would be dealt with by the appropriate representatives on the committees and be taken up by them, as necessary, with their respective consultative councils or other bodies of higher reference. (Pages 36-38).

9 *Consumer Members for the Electricity Council and the Gas Council.* In order to provide a more effective and permanent channel for the representation of the collective viewpoints of the electricity and gas consultative councils at a national level than at present exists, and also a focal point at that level for dealing with national issues of import to electricity and gas consumers, there should be appointed a part-time consumer member to the Electricity Council and also a similar one to the Gas Council. Each of these consumer members should be concerned specifically with the consumer aspect of his council's policy; have independent right of access to the Minister; establish and maintain close liaison with, but remain independent of, all of the consultative councils in his industry; and be available to consider complaints brought to that level either by the councils or by individual complainants. Each should be provided with, and direct, an independent research staff, whose services should also be available to individual councils as required. Each should also be appointed to membership of the Minister's Energy Advisory Council as a representative of the domestic consumer interest. Neither appointment should in any way affect the present autonomy of individual consultative councils or their own rights of approach to the Minister. (Pages 38-40).

Domestic Coal Consumers' Council (and the Approved Coal Merchants Scheme)

10 *Publicity.* More publicity should be sought for the Domestic Coal Consumers' Council and for the work it is doing for solid fuel consumers generally. A number of the publicity suggestions put forward at paragraph 7 above for the electricity and gas consultative councils should assist to this end. (Page 46).

11 *Local Fuel Consumers Committees.* If local fuel consumers committees were to be set up on the lines suggested at paragraph 8 above, then the appointment (probably by the Council itself) of representatives of local solid fuel consumers to sit on these committees should serve to cover what appears to be a gap in the present machinery linking the Council (and also the Approved Coal Merchants Scheme) to these consumers. (Pages 47).

12 *Consultation with the Coal Board.* Provision should be made for the Council to be consulted directly by the Coal Board (see also paragraphs 13 and 14 below) instead of, as at present, only indirectly through the Minister, thus converting the Council, in effect, from a consumers' body into a consultative one and, as would then seem appropriate, changing its name to that of the 'Domestic Coal Consumers' Consultative Council'. (Pages 47-48).

13 *Membership.* In order to give added emphasis to the Council's independence as a consultative body, the representatives of the Coal Board and of the Gas Council should be removed from its membership, though they (or their equivalents) should remain available for briefing the Council on matters pertaining to their respective industries. Also in the interests of independence, the number of retail coal trade representatives included among the Council's members should be reduced to one, or at most two, these to be advisory only and without voting powers. To fill the vacancies, the replacement members should be recruited from the regions, so as to provide (along with those members already similarly recruited) a more comprehensive local coverage of the country on the Council. These latter members could also assist in developing local liaison with the regional panels of the Approved Coal Merchants Scheme and also with any local fuel consumers' committees that came to be set up. (Page 48).

14 *Chairman.* The chairman of the Council should be appointed a part-time *ex-officio* member of the Coal Board, so as to be able to speak for the Council at Board level and to be consulted by the Board about the consumer implications of its plans and policies. The chairman should also be appointed a member of the Minister's Energy Advisory Council (see also paragraph 9 above) to represent the domestic solid fuel consumer interest on that body. (Pages 48-49).

15 *Secretary.* The secretary should be appointed to the Council on a full-time basis, whether seconded, as now, from the Ministry or appointed independently from outside. (Page 49).

16 *Approved Coal Merchants Scheme.* The Approved Coal Merchants Scheme should be more widely publicised, especially at the local level, so that the assistance it can provide for consumers can become more widely known about. Some of the methods suggested at paragraph 7 above would also be suitable here. If necessary, some financial support to this end should be provided by the Ministry. When it becomes practicable to do so, consumer representatives (or assessors) should be appointed to the regional panels of the Approved Coal Merchants Scheme. (Page 46).

Transport Consultative Committees

Owing to present uncertainties as to the future of national transport policy, the following suggestions made as a result of our study are necessarily of a general and conditional nature.

17 *Railway Services.* Despite increasing subjection over recent years to competition from alternative forms of public and private transport, there still arise, for a number of reasons, numerous defects in the adequacy and quality of the services provided by railway transport which need to be taken up by the local transport users consultative committees (which, apart from in the London Area, are at present almost wholly concerned with matters relating to railway transport) on the railway users' behalf. To increase the effectiveness of the committees in this field, we suggest that, on the one hand, they need to seek more publicity for themselves and their work, so as to widen their contacts with railway users and their problems, and, on the other, to be made more representative of users generally, so as to cover (as it is understood that the Minister of Transport now proposes that they should cover) those categories of users whose 'social' needs have hitherto been insufficiently emphasised (e.g. the aged, the disabled, schoolchildren, shoppers, etc.). (Page 56).

18 *Transport Co-ordination.* In so far as plans come to be implemented for co-ordinating the different forms of transport by means of consultation and/or regional transport authorities, then, in view of the inevitably 'monopolistic' position in which such authorities would stand in relation to users of transport, it would be highly desirable for these latter to be effectively represented on such authorities. The most obviously appropriate bodies to provide such local transport users representatives would seem to be the transport users consultative committees, not least because of their independent right of approach to the Minister of Transport through their Central Consultative Committee. Moreover, such a development would open up to these committees an entirely new—and 'horizontal'—field of useful work on the transport users' behalf. (Pages 56-58).

19 *Powers of the Committees.* To function to effect in this co-ordinating field, the transport users committees would need: (a) to be empowered to consider matters (including charges, in so far as these are not competitively determined) excluded from their scope by the 1962 Transport Act, the actual range of such matters to depend largely on the range of those which the co-ordinating authorities were themselves empowered to consider; and (b) to have their field of reference widened to embrace *all* forms of transport and not, as virtually the case at present, be

limited to matters connected with rail transport. (Page 58).

20 *Central Transport Consultative Committee.* The Central Consultative Committee would also need to have its field of reference enlarged so as to cover all matters likely to be referred to it by the area committees as a result of developments on the lines suggested above, in particular to cover all forms of transport—road, air and water, as well as rail. It should be empowered, too, to consider charges, especially as a safeguard against defectiveness of competition in this field. Furthermore, the Committee, being the central consultative body representing transport users, should be brought fully into the planning process of national transport policy and be represented on committees set up by the Ministry of Transport to formulate such plans. (Page 58).

General

21 *Further Representations by Consultative Bodies.* If representations to the appropriate minister fail to lead to what the consultative bodies concerned regard as acceptable decisions in the interests of their consumers, then, in the case of complaints requiring judicial rather than administrative decisions, the bodies concerned should have access to an independent tribunal set up for the purpose to which they could take the complaints for final judgement; and,

in the case of matters of policy, they should be at liberty, and themselves be prepared, to pursue them, if need be, by:

- (a) seeking the support of public opinion, through the medium of appropriately directed publicity; and/or—
- (b) seeking the support of members of parliament. (Pages 61–63).

22 *Statutory Provisions.* Since to implement many of the suggestions we have put forward must involve changes in the statutory provisions to which the various consultative bodies are subject under the relevant enactments (now for the most part some twenty years old), we suggest that it is time for a comprehensive official review of these provisions to be undertaken and for any new provisions, which, in consequence, come to be introduced, to embody;

- (a) greater independence of organisation and action for the consultative bodies than appears to be allowed to some of them under present arrangements, especially in the field of national policy; and—
- (b) greater inbuilt self-adaptability for the consultative machinery as a whole in each industry, so that it can adapt itself to meet the changing requirements of operational efficacy in a constantly changing environment. (Page 63).

Appendix I

Sections from the Relevant Enactments

(1) Electricity Act, 1947—Section 7

Electricity Consultative Councils

(1) A Consultative Council shall be established for the purposes mentioned in this section for the area of every Area Board.

(2) Each of the said Councils shall consist of not less than twenty nor more than thirty persons to be appointed by the Minister of whom—

- (a) not less than half nor more than three-fifths shall be appointed from a panel of persons nominated from amongst members of local authorities in the area by such associations as appear to the Minister to represent those authorities; and
- (b) the remainder shall be appointed, after consultation with such bodies as the Minister thinks fit, to represent agriculture, commerce, industry, labour and the general interests of consumers of electricity and other persons or organisations interested in the development of electricity in the area.

In making the appointments mentioned in paragraph (b) of this subsection, the Minister shall have particular regard to any nominations made to him by the bodies aforesaid of persons who are recommended by them as having both adequate knowledge of the requirements of the interests to be represented and also the ability to exercise a wide and impartial judgment on the matters to be dealt with by the Council generally.

(3) A person shall be disqualified for being appointed or being the chairman of a Consultative Council so long as he is a member of the Commons House of Parliament, but a member of a Consultative Council other than the chairman shall not by reason of his appointment as such a member be disqualified for being elected to, or for sitting or voting as a member of, the Commons House of Parliament.

(4) Each of the said Councils shall be charged with the duties—

- (a) of considering any matter affecting the distribution of electricity in the area, including the variation of tariffs and the provision of new or improved services and facilities within the area, being a matter which is the subject of a representation made to them by consumers or other persons requiring supplies of electricity in that

area, or which appears to them to be a matter to which consideration ought to be given apart from any such representation, and where action appears to them to be requisite as to any such matter, of notifying their conclusions to the Area Board; and

- (b) of considering and reporting to the Area Board on any such matter which may be referred to them by that Board.

(5) Each of the said Councils shall be informed by the Area Board of that Board's general plans and arrangements for exercising and performing their functions under this Act and may make representations thereon to that Board.

(6) The Area Board shall consider any conclusion, reports and representations notified or made to them by the Council for their area under the two last foregoing subsections and the Council may, after consultation with the Area Board, make representations to the Central Authority on matters arising thereout.

(7) Where representations have been so made to the Central Authority and it appears to that Authority, after consultation with the Area Board and with the Council, that a defect is disclosed in that Area Board's general plans and arrangements for the exercise and performance of their functions under this Act, the Central Authority may give to the Area Board such directions as they think fit for remedying the defect and the Area Board shall give effect to any such directions.

(8) A Consultative Council may, after consultation with the Central Authority, make representations to the Minister on any matters arising out of representations made by them to the Central Authority under subsection (6) of this section, and if it appears to the Minister, after consultation with the Area Board and with the Council, that a defect is disclosed in the Area Board's general plans and arrangements for the exercise and performance of their functions under this Act, he may notify the defect to the Central Authority, and thereupon the Central Authority shall give to the Area Board such directions as they think necessary for remedying the defect, and the Area Board shall give effect to any such directions.

(9) Every Consultative Council shall prepare and submit to the Minister a scheme for the appointment by them of committees or individuals to be local

representatives of the Council in such localities as may be specified in the scheme, and it shall be the duty of such committees and individuals to consider the particular circumstances and requirements of those localities with respect to the distribution of electricity and to make representations to the Council thereon, and to be available for receiving on behalf of the Council representations from consumers in those localities; and, if the scheme is approved by the Minister, the Consultative Council shall put it into effect.

A member of a Consultative Council shall be eligible for appointment under such a scheme, either as a member of a committee or as an individual, but membership of the Council shall not be a necessary qualification for such an appointment.

(10) A Consultative Council may, subject to the approval of the Minister as to numbers, appoint such officers as appear to the Council to be requisite for the proper exercise and performance of their functions (including functions of any committee or individual appointed under the last foregoing subsection), and there shall be paid by the Central Authority—

(a) to the members of the said Councils or of any such committee or to any such individual such allowances in respect of any loss of remunerative time and such travelling allowances and allowances in respect of their out-of-pocket expenses; and

(b) to the officers of the said Councils such remuneration (whether by way of salary or fees) and such allowances,

as the Minister may with the approval of the Treasury determine.

(11) A Consultative Council shall be furnished by the Area Board concerned with such office accommodation as appears to the Board to be requisite for the proper exercise and performance of their functions (including the functions of any such committee or individual as aforesaid) or as may be directed by the Minister.

(12) Where, in consequence of the variation of the areas of Area Boards under the foregoing provisions of this Part of this Act, it is necessary to establish new Consultative Councils under this section, the Minister may by order provide for dissolving and winding up the affairs of any Consultative Council who cease to exercise or perform functions by reason of the variation.

(13) Provision may be made by regulations in relation to Consultative Councils for any matters for which provision may be made by regulations under section three of this Act in relation to the Central Authority and any Area Board, and for the

appointment of a chairman of each of the said Councils, with or without provision for another to act in his place, and, subject to the provisions of any such regulations, the said Councils shall have power to regulate their own procedure.

(14) The foregoing provisions of this section other than subsection (8) shall apply to the North of Scotland Board as if that Board were an Area Board and the North of Scotland District were the area of an Area Board, subject to the modifications that—

(a) for references to the Minister there shall be substituted references to the Secretary of State; and

(b) for the references to the Central Authority there shall be substituted—

(i) in subsections (6) and (7) references to the Secretary of State, and

(ii) in subsection (10) references to the North of Scotland Board.

(2) Electricity Act 1957—Section 5 First Schedule—Part I

Electricity Consultative Councils in England and Wales—Amendments of Section 7 of Electricity Act, 1947

(1) The following provisions shall be substituted for subsection (2) of section seven of the principal Act (which relates to the constitution of Consultative Councils):—

“(2) Each of the said Councils shall consist of a chairman appointed by the Minister and of not less than twenty or more than thirty other persons so appointed of whom—

(a) not less than two-fifths or more than three-fifths shall be appointed from a panel of persons nominated by such associations as appear to the Minister to represent local authorities in the area;

(b) the remainder shall be appointed, after consultation with such bodies as the Minister thinks fit, to represent agriculture, commerce, industry, labour and the general interests of consumers of electricity and other persons or organisations interested in the development of electricity in the area.

(2A) In the appointment of any person under paragraph (a) of the last foregoing subsection the Minister shall have particular regard to his ability to exercise a wide and impartial judgment on the matters to be dealt with by the Council generally; and in making appointments under paragraph (b) of that subsection the Minister shall have particular regard to any nominations made to him, by the bodies mentioned in that paragraph, of persons who are

recommended by them as having both adequate knowledge of the requirements of the interests to be represented and also the ability to exercise a wide and impartial judgment on the matters to be dealt with by the Council generally'.

(2) After paragraph (b) of subsection (4) of the said section seven (which relates to the duties of Consultative Councils) the following paragraphs shall be added:—

'(c) of considering any matter affecting the variation of any tariff regulating the charges for the provision of bulk supplies of electricity by the Generating Board for distribution in the area, being a matter which is either the subject of a representation made to them by consumers or other persons requiring supplies of electricity in the area, or which appears to them to be a matter to which consideration ought to be given apart from any such representation, and, where after consultation with the Area Board action appears to them to be requisite as to any such matter of notifying their conclusions to the Generating Board;

(d) of considering and reporting to the Generating Board on any such matter as is mentioned in the last foregoing paragraph which may be referred to them by the Generating Board'.

(3) The following provisions shall be substituted for subsection (6) to (8) of the said section seven (which relates to action consequential upon conclusions, reports or representations notified or made by a Consultative Council):—

'(6) The Area Board or the Generating Board, as the case may be, shall consider any conclusions, reports or representations notified or made to them by a Consultative Council under subsection (4) or subsection (5) of this section; and the Council may, after consultation with the Area Board, and, in the case of any conclusion or report notified or made to the Generating Board, after consultation with that Board also, make representations to the Electricity Council on matters arising thereout.

(7) Where representations have been made to the Electricity Council under the last foregoing subsection with respect to one of the Electricity Boards, and it appears to that Council, after consultation with the Board in question and with the Consultative Council making the representations, that a defect is disclosed in that Board's general plans and arrangements for the exercise and performance of their functions, the Electricity Council may give to that Board such advice as they think fit for remedying the defect.

(8) A Consultative Council may, after consultation with the Electricity Council, make representations to the Minister on any matters arising out of representations made by them under subsection (6) of this section with respect to one of the Electricity Boards; and if it appears to the Minister, after consultation with that Board and with the Consultative Council making the representations, that a defect is disclosed in the Board's general plans and arrangements for the exercise and performance of their functions, he may give such directions to the Board as he thinks necessary for remedying the defect.

(3A) Where representations, relating to any such matter as is mentioned in paragraph (a) or paragraph (c) of subsection (4) of this section, have been made to a Consultative Council, and the Consultative Council do not consider any action to be requisite with respect thereto, the Council shall notify their conclusions to the person making the representations; and if that person submits those representations to the Electricity Council, then—

(a) if it appears to the Electricity Council, after consultation with the Electricity Board to whom the representations relate and with the Consultative Council, that a defect is disclosed in that Board's general plans and arrangements for the exercise and performance of their functions, the Electricity Council may give to that Board such advice as they think fit for remedying the defect;

(b) the Electricity Council may make representations to the Minister on any matters arising out of advice given by them to an Electricity Board under the foregoing paragraph; and

(c) if it appears to the Minister, after consultation with the Board and with the Electricity Council, that a defect is disclosed in that Board's general plans and arrangements for the exercise and performance of their functions, he may give such directions to the Board as he thinks necessary for remedying the defect.'

(4) The Electricity Council shall be substituted for the Central Authority as the body required to pay the allowances and remuneration referred to in subsection (10) of the said section seven (which relates to the appointment of officers of Consultative Councils and to the allowances and remuneration of members and officers of such Councils); and accordingly in that subsection, for the words 'Central Authority', there shall be substituted the words 'Electricity Council'.

(5) After subsection (11) of the said section seven there shall be inserted the following subsection:—

'(11A) In respect of matters not falling within subsection (10) of subsection (11) of this section, a Consultative Council may, within such limits as the Minister with the approval of the Treasury may from time to time determine, incur such expenditure as the Council may consider requisite for the exercise and performance of their functions; and any such expenditure shall be repaid to the Consultative Council by the Electricity Council.'

(6) The following subsection shall be substituted for subsection (13) of the said section seven:—

'(13) The Minister may make provision by regulations in relation to Consultative Councils in England and Wales for any matters for which provision may be made by regulations under section three of this Act in relation to Area Boards, and for the appointment of persons to act in the place of the chairmen of such Councils.

Subject to the provisions of any such regulations, the said Councils shall have power to regulate their own procedure.'

(3) Gas Act, 1948—Section 9

Gas Consultative Councils

(1) A Council, to be known as a Gas Consultative Council, shall, not later than six months after the vesting date, be established for the purposes mentioned in this section for the area of every Area Board.

(2) A Gas Consultative Council shall consist of a chairman appointed by the Minister and not less than twenty nor more than thirty other members appointed by the Minister of whom—

- (a) not less than half nor more than three-quarters shall be appointed from a panel of persons nominated from amongst members of local authorities in the area by such associations as appear to the Minister to represent those authorities; and
- (b) the remainder shall be appointed, after consultation with such bodies as the Minister thinks fit, to represent commerce, industry, labour and the general interests of consumers of gas and other persons or organisations interested in the development of gas in the area.

In making the appointments mentioned in paragraph (b) of this subsection, the Minister shall have particular regard to any nominations made to him by the bodies aforesaid of persons who are recommended by them as having both adequate knowledge of the requirements of the interests to be represented

and also the ability to exercise a wide and impartial judgment on the matters to be dealt with by the Council generally.

(3) A person shall be disqualified for being appointed or being the chairman of a Gas Consultative Council so long as he is a member of the Commons House of Parliament, but a member of a Gas Consultative Council other than the chairman shall not by reason of his appointment as such a member be disqualified for being elected to, or for sitting or voting as a member of, the Commons House of Parliament.

(4) The Gas Consultative Council for each area shall be charged with the duties—

- (a) of considering any matter affecting the supply of gas in the area, including the variation of tariffs and the provision of new or improved services and facilities within the area, being a matter which is the subject of a representation made to them by consumers or other persons requiring supplies of gas in that area, or which appears to them to be a matter to which consideration ought to be given apart from any such representation, and where action appears to them to be requisite as to any such matter, of notifying their conclusions to the Area Board; and
- (b) of considering and reporting to the Area Board on any such matter which may be referred to them by that Board.

(5) Each of the Gas Consultative Councils shall be informed by the Area Board of that Board's general plans and arrangements for exercising and performing their functions under this Act in relation to the supply of gas in their area and may make representations thereon to that Board.

(6) The Area Board shall consider any conclusions, reports and representations notified or made to them by the Gas Consultative Council for their area under the two last preceding subsections and the Council may, after consultation with the Area Board, make representations to the Minister on matters arising thereout.

(7) Where representations have been so made to the Minister and it appears to him after consultation with the Gas Council that there may be a defect in that Area Board's general plans and arrangements for exercising and performing their functions under this Act in relation to the supply of gas in their area, the Minister shall refer the representations for inquiry and report by a person appointed by him after consultation with the Lord Chancellor or, in the case of the Scottish Gas Board, after consultation with the Secretary of State, and if the Minister, after considering the report of the said person, is satisfied that there is a defect in the Area Board's general

plans and arrangements aforesaid, he shall give to the Area Board such directions as he thinks fit for remedying the defect and the Area Board shall give effect to any such directions, and the Minister shall send a copy of any such directions to the Gas Consultative Council.

(8) Every Gas Consultative Council shall prepare and submit to the Minister a scheme for the appointment by them of committees or individuals to be local representatives of the Council in such localities as may be specified in the scheme and it shall be the duty of such committees and individuals to consider the particular circumstances and requirements of those localities with respect to the supply of gas and to make representations to the Council thereon, and to be available for receiving on behalf of the Council representations from consumers in those localities; and, if the scheme is approved by the Minister, the Gas Consultative Council shall put it into effect.

A member of a Gas Consultative Council shall be eligible for appointment under such a scheme, either as a member of a committee or as an individual, but membership of the Council shall not be a necessary qualification for such an appointment.

(9) A Gas Consultative Council may, subject to the approval of the Minister as to numbers, appoint such officers as appear to the Council to be requisite for the proper exercise and performance of their functions (including functions of any committee or individual appointed under the last preceding subsection), and the Area Board shall pay—

- (a) to the members of the Council or of any such committee or to any such individual such allowances in respect of any loss of remunerative time and such travelling allowances and allowances in respect of their out-of-pocket expenses; and
- (b) to the officers of the Council such remuneration (whether by way of salary or fees) and such allowances,

as the Minister may with the approval of the Treasury determine, and shall pay such expenses incurred by the Council or any such committee or individual as the Minister may with such approval determine.

(10) A Gas Consultative Council shall be furnished by the Area Board concerned with such office accommodation as appears to the Board to be requisite for the proper exercise and performance of their functions (including the functions of any such committee or individual as aforesaid) or as may be directed by the Minister.

(11) Where, in consequence of the variation of the areas of Area Boards under the preceding provisions of this Part of this Act, it is necessary to establish new Gas Consultative Councils under this section,

the Minister may by order provide for dissolving and winding up the affairs of any Gas Consultative Council who cease to exercise or perform functions by reason of the variation.

(12) Provision may be made by regulations in relation to Gas Consultative Councils for any matters for which provision may be made by regulations under section five of this Act in relation to Area Boards and the Gas Council, and for the appointment of a deputy chairman of any Consultative Council, and, subject to the provisions of any such regulations, a Consultative Council shall have power to regulate their own procedure.

(4) Coal Industry Nationalisation Act, 1946—Section 4

Coal Consumers' Councils

(1) There shall be established for the purposes mentioned in this section two consumers' councils, to be known respectively as the Industrial Coal Consumers' Council and the Domestic Coal Consumers' Council.

(2) Each of the said councils shall consist of such number of persons as the Minister may think fit, appointed by him to represent the Board, and—

- (a) in the case of the Industrial Coal Consumers' Council, after consultation with such bodies representative of the interests concerned as the Minister thinks fit, to represent consumers of coal, coke and manufactured fuel respectively, for industrial purposes or other purposes involving supply in bulk, and persons engaged in organising or effecting the sale or supply, whether for home use or for export, of coal, coke and manufactured fuel respectively, for those purposes;
- (b) in the case of the Domestic Coal Consumers' Council, after consultation with such bodies representative of the interests concerned as the Minister thinks fit, to represent consumers of coal, coke and manufactured fuel respectively, for domestic purposes and other purposes not falling within the preceding paragraph, and persons engaged in organising or effecting the sale or supply of coal, coke and manufactured fuel respectively, for those purposes;

In formulating his proposals for appointments to each of the said councils, the Minister shall have particular regard to nominations made to him by the said bodies representative of the interests concerned of persons recommended by them as having both adequate knowledge of the requirements of those interests and also qualifications for exercising a wide and impartial judgment on the matters to be dealt with by the council generally.

(3) The Industrial Coal Consumers Council shall be charged with the duties—

(a) of considering any matter affecting the sale or supply, whether for home use or for export, of coal, coke or manufactured fuel for the purposes mentioned in paragraph (a) of subsection (2) of this section which is the subject of a representation made to them by consumers for those purposes of coal, coke or manufactured fuel as the case may be, or which appears to them to be a matter to which consideration ought to be given apart from any such representation, and, where action appears to them to be requisite as to any such matter, of notifying their conclusions to the Minister;

(b) of considering, and reporting to the Minister on, any such matter which may be referred to them by the Minister.

(4) The Domestic Coal Consumers' Council shall be charged with the like duties in relation to the sale or supply of coal, coke and manufactured fuel for the purposes mentioned in paragraph (b) of subsection (2) of this section.

(5) On the notification or making to the Minister by either of the said councils of their conclusions or report on any matter, if it appears to him, after consultation with the Board, that a defect is disclosed in the Board's general arrangements for the production, sale or supply of coal, coke or manufactured fuel, as the case may be, he may give to the Board such directions as he may think requisite for remedying the defect, and the Board shall give effect to any such directions.

(6) The said councils shall be furnished by the Minister with such clerks, officers and staff as appear to him, with the concurrence of the Treasury as to numbers, to be requisite for the proper discharge of their functions, and the Minister shall pay to the members of the said councils such allowances, and to the clerks, officers and staff of the said councils such remuneration and allowances, as he may with the approval of the Treasury determine, and shall pay such expenses incurred by the said councils as he may so determine.

(7) Provision may be made by regulations for or in connection with any such matters in relation to the said consumers' councils as are mentioned in subsection (7) of section two of this Act in relation to the Board, and for the appointment of a chairman of each of the said councils, with or without provision for another to act in his place, and, subject to the provisions of any such regulations, the said councils shall have power to regulate their own procedure.

(8) Each of the said councils shall make an annual

report to the Minister, and the Minister shall lay the reports before each House of Parliament.

(9) A regional industrial coal consumers' council or a regional domestic coal consumers' council may be appointed by the Minister for any prescribed locality for which such appointment appears to him to be expedient, whether in consequence of or apart from a recommendation in that behalf of the Industrial Council or the Domestic Council, as the case may be, established under subsection (1) of this section, and provision may be made by regulations for the dissolution of a regional council appointed for any locality if it appears to the Minister that such a council is no longer needed for that locality, or for the variation of the locality for which such a council is to act.

(10) Where there is a regional council for any locality, then, as regards consumers and sale or supply in that locality, the regional council shall be charged with the performance of such of the duties imposed on the Industrial Council or the Domestic Council, as the case may be, by subsection (3) or (4) of this section as may be prescribed, and provisions may be made by regulations as to the regional council's reporting to the Industrial Council or the Domestic Council, as the case may be, established under subsection (1) of this section or direct to the Minister, and generally as to the relations between the regional council and the said Industrial Council or Domestic Council.

(11) Subsections (2), (6) and (7) of this section shall apply to a regional council as they apply to the Industrial Council or the Domestic Council, as the case may be, established under subsection (1) of this section, with the substitution of references to consumers in the locality for which the regional council is to act and to sale or supply therein for references to consumers and to sale or supply generally, and subsection (5) of this section shall apply on the notification or making direct to the Minister of conclusions or a report of a regional council.

(12) In this section the expression 'manufactured fuel' means any manufactured fuel (including carbonised briquettes and ovoids) of which coal or coke is the principal constituent.

(5) Transport Act, 1947—Section 8 **Transport Consultative Committees**

(1) There shall be established in accordance with the provisions of this section a Central Transport Consultative Committee for Great Britain and, for such areas in Great Britain as are mentioned in subsection (3) of this section, either—

(a) a Transport Users Consultative Committee in respect of passenger traffic and a Transport

Users Consultative Committee in respect of goods traffic; or

- (b) a Transport Users Consultative Committee in respect of both passenger and goods traffic.

(2) The Minister may at any time, after consultation with the Central Transport Consultative Committee, abolish any Transport Users Consultative Committee.

(3) The areas for which there are to be Transport Users Consultative Committees shall be such areas in Great Britain as the Minister may from time to time direct:

Provided that—

- (a) there shall be no part of Great Britain which is not within the area of a Transport Users Consultative Committee; and

- (b) whether or not there are a Transport Users Consultative Committee or Transport Users Consultative Committees for areas consisting of or including parts of Scotland and parts of Wales, there shall at all times be a Transport Users Consultative Committee in respect of both passenger and goods traffic for Scotland and a Transport Users Consultative Committee in respect of both passenger and goods traffic for Wales,

and the powers of the Minister under this and the last preceding subsection shall be exercised accordingly.

(4) Every such Committee as aforesaid shall consist of such number of persons appointed by the Minister as the Minister may from time to time determine, being—

- (a) an independent chairman;
- (b) members appointed, after consultation with such bodies representative of the interests concerned as the Minister thinks fit, to represent agriculture, commerce, industry, shipping labour and local authorities; and
- (c) members appointed from among persons nominated by the Commission:

Provided that—

(i) in the case of the Central Transport Consultative Committee, the persons nominated by the Commission shall include at least one member of the Commission;

(ii) members need not be appointed under paragraph (b) of this sub-section to any Transport Users Consultative Committee to represent any of the interests mentioned in paragraph (b) of this subsection which in the opinion of the Minister need not be represented on that Committee; and

(iii) the Minister may, if he thinks fit, appoint to any such committee not more than two additional members.

(5) A person who is appointed a member of a Committee established under this section shall not by reason of his appointment be disqualified for being elected to, or for sitting or voting as a member of, the Commons House of Parliament.

(6) The members of any Committee established under this section shall hold and vacate their office in accordance with the terms of their respective appointments and shall, on ceasing to be members of the Committee, be eligible for reappointment:

Provided that any member may at any time by notice in writing to the Minister resign his office.

(7) Every Committee appointed under this section shall consider and, when it appears to the Committee to be necessary, make recommendations in regard to any matter (including charges) affecting the services and facilities provided by the Commission which has been the subject of representations (other than representations which appear to the Committee to be frivolous) made to the Committee by users of those services or facilities, or which appears to be a matter to which consideration ought to be given, or which the Minister or Commission may refer to them for consideration; and every such Committee shall meet when convened by the chairman thereof, but in no case less frequently than twice a year, and, without prejudice to the discretion of the Chairman to call a meeting of the Committee whenever he thinks fit so to do, he shall call a meeting thereof when required so to do by any three members of the Committee.

(8) Minutes shall be kept of the proceedings of every such Committee and copies of the minutes and of the recommendations or conclusions of any such Committee shall—

- (a) in the case of a Transport Users Consultative Committee, be sent to the Central Transport Consultative Committee and to the Commission;
- (b) in the case of the Central Transport Consultative Committee, be sent to the Minister and to the Commission,

and where a copy of a recommendation of the Central Transport Consultative Committee is sent to the Minister, the Minister may give such directions to the Commission with respect to the matters dealt with by the recommendation as he thinks fit, and the Commission shall give effect to any such directions.

(9) The Central Transport Consultative Committee shall make an annual report to the Minister, and the Minister shall lay a copy of that report before each House of Parliament.

(10) The Commission shall provide every such Committee with such officers and servants, and such office accommodation, as appear to the Commission to be

requisite for the proper discharge of the Committee's functions or as may be directed by the Minister; and they may pay to the members of any such Committee allowances in respect of any loss of remunerative time in accordance with a scale approved by the Minister and the Treasury and such travelling allowances and such allowances in respect of their out-of-pocket expenses as the Commission may determine.

(11) The panels set up under section twenty-three of the Ministry of Transport Act, 1919, and the Transport Advisory Council set up under section forty-six of the Road and Rail Traffic Act, 1933, shall cease to exist.

(6) Transport Act, 1962—Section 56

Transport Consultative Committees

56.—(1) There shall be established in accordance with this Section—

- (a) a Central Transport Consultative Committee for Great Britain (hereinafter referred to as the 'Central Committee'), and
- (b) Area Transport Users Consultative Committees (hereinafter referred to as 'Area Committees') for such areas of Great Britain as the Minister may from time to time direct, but so that there is no part of Great Britain which is not within the area of an Area Committee and so that there is at all times an Area Committee for Scotland and an Area Committee for Wales and Monmouthshire.

(2) The Central Committee shall consist of a chairman appointed by the Minister, the chairmen of the Area Committees and such other members (not exceeding six) as the Minister may appoint after consultation with such bodies as appear to him to be representative of the interests of persons likely to be concerned with matters within the competence of the committee; and each Area Committee shall consist of a chairman appointed by the Minister, such other members as the Minister may appoint after consultation with such bodies as appear to him to be representative of the interests of persons likely to be concerned with matters within the competence of the committee and such other members (not exceeding two) as the Minister may appoint without such consultation.

The chairman of any Area Committee may appoint another member of that committee to attend a meeting of the Central Committee in his stead.

(3) The persons appointed to be members of any committee under this section shall hold and vacate office in accordance with the terms of their respective appointments and shall, on ceasing to be members of the committee, be eligible for re-appointment;

Provided that any such person may at any time by notice in writing to the Minister resign his office.

(4) Subject to the following provisions of this section, it shall be the duty of the Central Committee and of each Area Committee to consider and, where it appears to them to be desirable, make recommendations with respect to any matter affecting the services and facilities provided by any of the Boards—

- (a) which has been the subject of representations (other than representations appearing to the committee to be frivolous) made to the committee by or on behalf of users of those services or facilities, or
- (b) which has been referred to the committee by the Minister or by a Board, or
- (c) which appears to the committee to be a matter to which consideration ought to be given;

and copies of the minutes, conclusions and recommendations of each committee shall be sent to the Board concerned and—

- (i) in the case of any Area Committee, to the Central Committee; and
- (ii) in the case of the Central Committee and the Area Committees for Scotland and for Wales and Monmouthshire, to the Minister.

(5) Nothing in the last foregoing subsection shall entitle any committee to consider the charges made for any service or facility, or to consider any question relating to the discontinuance or reduction of railway services except as provided in the following provisions of this section; and the Central Committee shall not be obliged to consider any representation which appears to them to be more suitable for consideration by an Area Committee or which has been previously considered by an Area Committee.

(6) Where the Minister receives a recommendation under sub-section (4) of this section he may give to the Board concerned such directions as he thinks fit with respect to the matters dealt with in the recommendation.

(7) Where the Railways Board or London Board propose to discontinue all railway passenger services from any station or on any line (hereinafter referred to as a closure), they shall, not less than six weeks before carrying their proposal into effect, publish in two successive weeks in two local newspapers circulating in the area affected, and in such other manner as appears to them appropriate, a notice—

- (a) giving the date and particulars of the proposed closure, and particulars of any alternative services which it appears to the Board will be available and of any proposals of the Board

for providing or augmenting such services; and

- (b) stating that objections to the proposed closure may be lodged in accordance with this section within six weeks of a date specified in the notice (being the date on which the notice is last published in a local newspaper as required by this section);

and copies of the notice shall be sent to the appropriate Area Committee.

For the purposes of this and the next following subsection the appropriate Area Committee is the committee for the area in which the station or the line, or any part of the line, affected by the proposed closure is situated.

(8) Where a notice has been published under the last foregoing subsection any user of any service affected and any body representing such users may within the period specified in the notice lodge with the appropriate Area Committee an objection in writing, and where such an objection is lodged the committee shall forthwith inform the Minister and the Board concerned and the closure shall not be proceeded with until the committee has reported to the Minister and the Minister has given his consent.

(9) A committee with whom an objection has been lodged under the last foregoing subsection shall consider the objection and any representations made by the Board concerned and report to the Minister as soon as possible on the hardship, if any, which they consider will be caused by the proposed closure and the report may contain proposals for alleviating that hardship.

Where objections with respect to any proposed closure have been lodged with more than one Area Committee, the committees in question—

- (a) may report to the Minister jointly, or
(b) may agree that the consideration of objections and representations relating to the closure and the making of a report to the Minister shall be delegated to any of those committees appearing to them to be principally concerned;

and copies of every report under this and the next following subsection shall be sent to the Central Committee and to the Board concerned.

(10) The Minister may require an Area Committee to make a further report; and if in any case the Minister considers that a report or further report has been unreasonably delayed he may, after consulting the committee concerned and making such enquiries as he thinks fit, consent to the proposed closure without awaiting the report or further report.

(11) In any case in which a closure requires the consent of the Minister under this section, the Minister

may give his consent subject to such conditions as he thinks fit and may from time to time vary those conditions; and the Minister may in connection with the closure from time to time give such directions to the Board concerned, as he thinks fit.

Where a condition attached to a consent or a direction, requires the Board to provide or assist in the provision of alternative services, the Minister may refer to an Area Committee any matter relating to those services, and the committee shall consider and report to the Minister on that matter.

(12) Every committee established under this section shall meet when convened by the chairman thereof, but in no case less frequently than twice a year, and, without prejudice to the discretion of the chairman to call a meeting whenever he thinks fit, he shall call a meeting when required so to do by any three members of the committee and minutes shall be kept of the proceedings at every meeting.

(13) Where for the purposes of subsection (9) of this section a committee decide to hear an objector orally, or to hear oral representations made on behalf of a Board, they shall hear the objector and the representations in public.

(14) Subject to subsections (12) and (13) of this section, every committee established under this section shall determine its own procedure including the quorum at meetings of the committee; and the Central Committee may from time to time make general recommendations to the Area Committees with respect to any matter affecting the procedure or functions of those committees.

(15) The Central Committee and the Area Committees for Scotland and for Wales and Monmouthshire shall make an annual report to the Minister, and the Minister shall lay a copy of those reports before each House of Parliament.

(16) The Boards shall provide every committee established under this section with such officers and servants, and such office accommodation, as appear to the Boards to be requisite for the proper discharge of the Committees' functions or as may be directed by the Minister; and the Boards may pay to the members of any such committee allowances in respect of loss of remunerative time in accordance with a scale approved by the Minister with the consent of the Treasury and such travelling allowances and allowances in respect of out-of-pocket expenses as the Boards may determine.

The Boards shall contribute to the expenses incurred by them under this subsection in such proportions as they may agree or as the Minister may in default of agreement direct.

(17) The transitional provisions in Part III of the Seventh Schedule to this Act shall have effect for

the purposes of this section.

(18) For the purposes of subsection (4) of this section, any shipping service provided by the Caledonian Steam Packet Company Limited or the Caledonian Steam Packet Company (Irish Services) Limited shall, so long as the company providing the

service is a subsidiary of the Railways Board, be deemed to be a service provided by that Board.

(19) Before the vesting date references in this section to the Boards or to any Board shall be construed, except so far as the context otherwise requires, as references to the Commission.

Appendix II

Lists of Names and Addresses of Consultative Bodies

(1) Electricity Consultative Councils

Area

Eastern	Chairman Secretary Telephone No. Address	Ald Sir William J. Bennett, CBE, DL, JP Mr F. W. Clarke Ipswich 55841 Wberstead, Ipswich.
East Midlands	Chairman Secretary Telephone No. Address	Mr L. L. Perkins Mr C. J. Boreham Nottingham 63221 Mapperly Hall, Nottingham.
London	Chairman Secretary Telephone No. Address	The Rt Hon Lord Crook, JP Mr M. C. Vinicombe London Wall 1280 46-47 New Broad Street, London EC2.
Merseyside and North Wales	Chairman Secretary Telephone No. Address	Mr H. Evans, JP Miss D. V. Black Central 8681 (STD Code 051) 17/18 Erwell Chambers East, Union Street, Old Hall Street, Liverpool 3.
Midlands	Chairman Secretary Telephone No. Address	Mr L. V. Pike, MBE, JP Mr W. C. Frise 021-422 8087 Shawton House, 794 Hagley Road West, Birmingham 32.
North Eastern	Chairman Secretary Telephone No. Address	Lt Col R. T. Edwards, AFC, TD Mr B. F. Fallaw Newcastle 27520 Carlton House, Newcastle-upon-Tyne.
North of Scotland	Chairman Secretary Telephone No. Address	The Rt Hon Lord Macdonald, MBE, JP Mr D. C. Neillands Caledonian 1361 16 Rothesay Terrace, Edinburgh.
North Western	Chairman Secretary Telephone No. Address	Sir Raymond Street, KBE, Mr H. A. Bailey Blackfriars 4362 Longridge House, Corporation Street, Manchester 4.

Area

South Eastern	Chairman Secretary Telephone No. Address	Ald Commander D. S. E. Thompson, RN (Ret'd) Mr L. W. Goodman, DFC, TD Brighton 739211 10 Queen's Gardens, Hove, Sussex.
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Southern	Chairman Secretary Telephone No. Address	Sir Walter Dawson, KCB, CBE, DSO Brigadier L. A. Roche, DSO Maidenhead 21321 Littlewick Green, Maidenhead, Berks.
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South of Scotland	Chairman Secretary Telephone No. Address	Councillor Thomas Fulton Mr P. E. MacFarlane Merrylee 7177 (Ext. 14) Cathcart House, Inverlair Avenue, Glasgow S4.
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South Wales	Chairman Secretary Telephone No. Address	Ald E. T. Kinsey-Morgan, CBE, JP Mr G. J. Maddocks Cardiff 26093 Royal Chambers, Park Place, Cardiff.
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South Western	Chairman Secretary Telephone No. Address	Lady Carew Pole, CBE Mr K. B. Scott, MBE Exeter 58968 Pearl Assurance House, High Street, Exeter.
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Yorkshire	Chairman Secretary Telephone No. Address	Mr William Leach, OBE Mr R. E. Snowden Leeds 65 8271 Wetherby Road, Searcroft, Leeds.
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(2) Gas Consultative Councils

Eastern	Chairman Secretary Telephone No. Address	Mr W. C. Kincaid Mr R. C. Smith Letchworth 5399 12a Eastcheap, Letchworth, Herts.
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East Midlands	Chairman Secretary Telephone No. Address	Councillor G. E. Dearing, CBE, JP Mr T. A. Edwards Leicester 25808 2 Salisbury Road, Leicester.
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North Eastern	Chairman Secretary Telephone No. Address	Councillor/Ald H. Sutcliffe Mr C. L. Davies Leeds 36291 New York Road, Leeds 2.
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Northern	Chairman Secretary Telephone No. Address	Ald J. Hoy, CBE, DEM, DL, JP Mrs M. Watson Sutherland 4801 PO Box 39, Fawcett Street, Sunderland.
North Thames	Chairman Secretary Telephone No. Address	Mr E. Bayliss, OBE, KStJ, DL, JP Mr A. E. Spencer Temple Bar 0754/5 28 Charing Cross Road, London, WC2.
North Western	Chairman Secretary Telephone No. Address	Mr R. M. Bradburn Miss R. Collier Central 4411 St. Andrew's House, Portland Street, Manchester 1.
Scottish	Chairman Secretary Telephone No. Address	Dame Jean Roberts, OBE, DL, JP Mr A. B. Leitch Caledonian 5131 26 Drumsheugh Gardens, Edinburgh 3.
South Eastern	Chairman Secretary Telephone No. Address	Mr Richard Edmonds Mr L. J. V. Yates Reliance 3265 Broadway House, 3 Broadway, London SW8.
Southern	Chairman Secretary Telephone No. Address	Mr F. C. Rea, OBE, TD Mr C. King Bournemouth 20371 136 Old Christchurch Road, Bournemouth, Hants.
South Western	Chairman Secretary Telephone No. Address	Ald W. F. Hender, OBE Mr G. A. Lewis, MBE Plymouth 67707 Royal Building, St. Andrew's Cross, Plymouth, Devon.
Wales	Chairman Secretary Telephone No. Address	Sir Cennydd Traherne, TD, JP Mr David Jones Cardiff 26547 St. Davids House (2nd Floor, West Wing), Wood Street, Cardiff.
West Midlands	Chairman Secretary Telephone No. Address	Ald J. H. Lewis, OBE, JP Mr F. B. Wilkes Edgbaston 5510 2 Greenfield Crescent, Edgbaston, Birmingham.

(3) Domestic Coal Consumers' Council and the Approved Coal Merchants Scheme

Domestic Coal Consumers' Council	Chairman Secretary Telephone No. Address	Mrs M. R. Beale, OBE Mr R. A. Pattison Abbey 7000 (Ext. 1177) Thames House South, Millbank, London SW1.
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Approved Coal Merchants' Scheme

National Panel	National Sec. Telephone No. Address	Mr J. F. Brown 01-837 8639 Derbyshire House, St Chad's Street, London, WC1
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Area

Regional Panels

Eastern (Bedfordshire, Cambridgeshire, Essex, Hertfordshire, Norfolk, Suffolk, Huntingdonshire)	Secretary Telephone No. Address	Mr W. C. Weait 01-837 8630 Derbyshire House, St Chad's Street, London, WC1
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London (London)	Secretary Telephone No. Address	Mr G. L. Nicholson 01-692 7099 20 Parkfield Road, London, SE14.
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Midland (Hertfordshire, Shropshire, Staffordshire, Warwickshire, Worcestershire)	Secretary Telephone No. Address	Mr E. W. Hockings 021-454 8225 Pool House, 12 George Road, Edgbaston, Birmingham 15.
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North Eastern (Yorkshire (except parts of North Riding))	Secretary Telephone No. Address	Mr W. D. Brunt 053-2 34371 9 Wellington Street, City Square, Leeds 1.
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Northern (Northumberland, Durham and part of North Riding of Yorkshire)	Secretary Telephone No. Address	Mr P. Cairns 063-2-878822 (Ext. 462) c/o National Coal Board, Team Valley, Gateshead 11.
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North Midland (Derbyshire, Leicestershire, Lincolnshire, Northamptonshire, Nottinghamshire, Rutland)	Secretary Telephone No. Address	Mr W. B. Leivers 060-2-47952 Cavendish Buildings, Wheeler Gate, Nottingham.
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North Western (Cheshire, North Wales, Isle of Man, Lancashire, Westmorland, Cumberland)	Secretary Telephone No. Address	Mr J. L. Dutton 0523-5-72404 (Ext. 453) Anderton House, Newton Road, Lowton, Warrington, Lancs.
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Area

Scotland	Secretary Telephone No. Address	Mr R. V. Morton 031-FOuntainbridge 1566 9 Atholl Place, Edinburgh 3.
South Eastern (Kent, Surrey, Sussex)	Secretary Telephone No. Address	Mr G. L. Nicholson 01-692 7089 20 Parkfield Road, London, SE14
Southern (Berkshire, Buckinghamshire, Hampshire and Isle of Wight, Oxfordshire)	Secretary Telephone No. Address	Mr W. C. Weait 01-837 8630 Derbyshire House, St Chad's Street, London, WC1
South Wales	Secretary Telephone No. Address	Mr L. C. Munn 022-2-32159 4 Dock Chambers, Bute Street, Cardiff.
South Western (Cornwall, Devon, Gloucestershire, Somerset, Wiltshire, Dorset)	Secretary Telephone No. Address	Mr D. A. White 0272-30648 12 Eaton Crescent, Clifton, Bristol 8.

(4) Transport Consultative Committees

**Central Transport Consultative
Committee**

Great Britain	Chairman Secretary Telephone No. Address	Mr E. G. Whitaker, CBE Mr L. E. Plenty 01-734 0056 3/4 Great Marlborough Street, London W1.
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**Transport Users Consultative
Committees**

East Anglia	Secretary Telephone No. Address	Mr D. Gentle 060 322586 Westlegate House, 14/18 Westlegate, Norwich.
East Midland	Secretary Telephone No. Address	Mr C. E. Cresswell 0332 42310 44 Friar Gate, Derby.
London	Secretary Telephone No. Address	Mr G. T. Tippet, MBE 01-734 7683 3/4 Great Marlborough Street, London W1.
North Eastern	Secretary Telephone No. Address	Mr J. A. Fearn 0904 25615 Toft Green Chambers, Toft Green, York.

Area

North Western	Secretary Telephone No. Address	Mr C. Dove, MBE 061-236 3793 Room 18, Peter House, 2 Oxford Street, Manchester 1.
Scotland	Secretary Telephone No. Address	Mr L. A. Dumelow 031-225 4604 39 George Street, Edinburgh 2.
South Eastern	Secretary Telephone No. Address	Mr H. C. L. Trickett 01-928 2232 3/4 Great Marlborough Street, London W1.
South Western	Secretary Telephone No. Address	Mr E. G. Gomm 0272 25703 Magnet House, 32 Victoria Street, Bristol 1.
Wales and Monmouthshire	Secretary Telephone No. Address	Mr E. G. Gomm 0222 27247 22 The Chambers, 68 St. Mary Street, Cardiff.
West Midland	Secretary Telephone No. Address	Mr Geo. Gribble 021-643 3021 Room 307, 260 Broad Street, Birmingham 1.
Yorkshire	Secretary Telephone No. Address	Mr J. A. Fearn 0904 25615 Toft Green Chambers, Toft Green, York.

Note

Though there are eleven area committees, the secretariats of the North Eastern and the Yorkshire Transport Users Consultative Committees and also those of the South Western and the Wales and Monmouthshire Transport Users Consultative Committees have now been amalgamated.

Appendix III

Summaries of Complaints

(1) North Western Electricity Consultative Council—Summary of Complaints made to the Council in 1964-65 and 1965-66.

(Reproduced from the Council's Annual Report for 1966).

<i>No. received 1964-65</i>	<i>Nature or Subject of Complaints</i>	<i>No. received 1965-66</i>
	Delay in affording supply—	
2	Urban	1
2	Rural	4
	Tariffs:	
4	Commercial	6
28	Domestic	12
1	Industrial	—
1	Street Lighting	—
37	Off-peak (all classes)	4
—	Farm	1
	Accounts:	
58	Disputed Consumption	63
7	Disputed Contracting and Appliance Repairs	20
6	Requests for Pre-payment Meters	5
—	Objections to wording or receipt of Final Notice	4
3	Objections to Minimum Charge for Repairs	3
5	Objections to Estimation of Accounts	7
31	Disconnection of Supply	22
2	Meter Reading Difficulties	6
40	General	22
15	Fluctuating Voltage	10
13	Unsatisfactory Appliances, Repairs and Workmanship	27
21	Poor Consumer Service	24
3	Supply Interruptions and Breakdowns	2
11	Re-sale of Metered Electricity	33
3	Substations—Bad Siting, Un-sightly and Noisy	3
3	Poor Service from Electrical Contractors or Appliance Manufacturers	5
3	Withdrawal of Outstand Collection Facilities	8
32	Miscellaneous	23
331		313

This total is based on the Council's records of correspondence and interviews with consumers and does not take into account complaints and enquiries dealt with personally by members of the Council and District Committees.

(2) London Area Transport Users Consultative Committee—Summary of Complaints made to the Committee during 1964, 1965 and 1966 (excluding complaints associated with railway closures).

(Reproduced by kind permission of the Central Transport Consultative Committee)

Part I—Railway matters

<i>Subject</i>	<i>1964</i>	<i>1965</i>	<i>1966</i>
Reduction of train services	4	1	4
Withdrawal of through trains	—	11	1
Withdrawal of off-peak services	5	16	2
Withdrawal of Sunday services	18	3	—
Request for re-opening of closed line	—	1	—
Overcrowding in commuter peaks	—	—	2
Overcrowding long distance trains	—	1	1
Timetable criticisms	2	2	2
Unpunctuality	2	2	2
Closure of station entrances	14	2	4
Queuing at Main Line stations	1	—	—
Insufficient heating in trains	—	1	—
Insufficient platform shelters	—	—	3
Seat reservations	1	1	1
Dining car and buffet services	—	—	2
Criticism of stations, rolling stock or equipment	4	8	1
Objection to use of 24-hour clock	1	—	—
Luggage delays	—	1	2
Left luggage facilities	1	—	1
Shortage of Porters	—	1	—
Freights and parcels delays	2	2	1
Ticket regulations	1	—	—
Ticket refunds	1	2	—
Availability of cheap tickets	—	1	1
Interavailability of rail tickets	1	1	—
Fares and charges	6	2	8
Totals	64	59	33*

Part II—Bus and Coach matters

<i>Subject</i>	<i>1964</i>	<i>1965</i>	<i>1966</i>
Withdrawal of bus routes	1	2	5
Withdrawal of Sunday services	2	3	1
Change of routing	—	—	2
Reduction of bus services	—	2	—
Inadequacy of service	2	7	5
Irregular running and service gaps	14	12	5
Requests for new bus services	—	4	4
Request for accelerated service	—	—	1
Timetable criticisms	1	—	—
Lack of information re timetable changes	1	—	1
Bus/train connections	1	1	1
Objections to standee bus service	—	—	2
Restriction of standing passengers	—	1	—
Restriction of smoking on buses	1	—	—
Siting of bus stops	2	—	—
Request for bus shelter	—	—	1
Conduct of bus staff	6	4	2
Fares and charges	6	—	3
Total	37	36	33*

*8 months only.

Appendix IV

Publicity Arrangements

Eastern Gas Consultative Council—Publicity Arrangements

(Reproduced by kind permission of the Council).

Posters

Posters showing the names and addresses of members of Local Committees are displayed in all showrooms and offices of the Board in a standard frame. These are usually placed near the cash desk in each showroom. They are also sent by the Council to local authorities in the area, for display in town halls, councils offices, libraries or reading rooms, citizens' advice bureaux, parishes, etc. and in any other suitable places.

500 copies are distributed.

Plastic Notices

Self-adhesive plastic notices have been issued to all the Board's showrooms in the area for fixing to glass doors, so that, if the showroom is closed, the notices can be easily read from outside the premises.

Posters—Industrial Premises

Notices for display on notice boards in industrial premises for the benefit of employees are being distributed to industrialists throughout the area. They are being favourably received in many quarters.

500 have been printed as a first experiment. A further 750 are to be printed for issue to other bodies. To date, 162 industrialists have been written to and 12 have replied to say they will exhibit the notice on their works notice boards. 14 additional copies have been asked for. Lists of industrialists in the area were obtained from the regional office of C.B.I. and from the Board's Industrial Gas Officer.

Leaflets

Informative leaflets have been prepared for issue to all showrooms to be displayed in dispensers for the public to take and retain; and for distribution to local authorities for display in housing enquiry offices, to ratepayers associations in the area and to various other bodies.

5,000 copies have been printed for the Council and a further 10,000 ordered, in addition to the 10,000 for the Board's showrooms.

The Commission for New Towns, Hemel Hempstead, have asked for 2,000 copies and also for 12 copies of the Council's industrialists notice for display in their rent collecting offices.

Post Offices

The name and address of the Council appear on all local organisation lists exhibited in main and sub-post offices.

Telephone Directories

The Council's Letchworth address and telephone number now appeared in the Colchester, Norwich, Southend, Bedford, Cambridge, Oxford and Peterborough and Herts and North Middlesex telephone directories.

All directories now circulating in the Board's area include the Consultative Council's address and telephone number.

Quarterly Gas Account Forms

Gas accounts now have a reference to the Consultative Council on the reverse side.

Tenants Handbooks

All local authorities in the area were approached to see if they would include a statement on the Consultative Council in their tenants handbooks, should they issue such a publication. An approach was also made to New Towns Development Corporations and New Towns Commissions.

The number of authorities who agreed to the suggestion was most encouraging.

Council's Annual Reports

Reprints of the Council's Annual Reports are sent to local authorities, parliamentary constituency associations, womens organisations, citizens' advice bureaux, councils of social service, the press, chambers of trade and commerce, members of parliament and nominating bodies of members of the Council. Copies are also available to the public in each of the Board's showrooms.

A total of 1,600 copies are distributed.

Film

A suggestion has been made that consideration should be given to a film being made, illustrating the work of all consultative councils generally, which could be distributed widely to various organisations throughout the country.

Press Reports

Reports of each Council meeting are sent to the press, local authorities, chambers of trade and commerce and to members of parliament in the area; also to the Press Association, the B.B.C. and the I.T.V.

A total of 425 are distributed.

Appendix V

Statistical Findings of Field Survey

Undertaken for the Consumer Council by Social Surveys (Gallup Poll) Limited

Notes on the Tables

1 In some of the tables, the numbers of respondents in some of the breakdown groups, in particular the area ones, are very small. These results need therefore to be treated with caution.

2 In some cases, the replies of respondents add up to more than 100 per cent, owing to some of the respondents having given more than one reply.

3 Tables 1 to 26 give findings in percentages. Tables 27 to 38 give findings in absolute figures.

Table 1 Profiles of the (First) Survey Sample and of Users of the Consultative Organisations

	<i>All Users</i>	<i>Total (Weighted) Sample</i>
Base	15	5001
	%	%
Sex		
Men	71	48
Women	29	52
Age		
16-24	0	14
25-34	12	18
35-44	25	19
45-64	56	34
65 and over	7	15
Class		
Av+ (Upper)	7	5
Av (Upper middle and middle)	14	21
Av- (Lower middle & wage-earning)	72	64
Very poor	7	10
Region		
South	33	35
Midland and Wales	21	28
North	23	27
Scotland	23	10

Table 2 Knowledge of Consultative Organisations (Unprompted)

By Sex, Age and Class	Base	Percentages of those questioned who knew of the consultative organisations			
		Electricity C.C.	Gas C.C.	Solid Fuel A.C.M.S.*	Transport U.C.C.†
		%	%	%	%
By Sex					
Men	2415	15	14	10	6
Women	2586	9	9	6	2
By Age					
16-24 years	710	8	8	6	3
25-34 "	883	13	11	8	4
35-44 "	965	14	15	11	6
45-64 "	1706	13	13	9	5
65 and over	737	7	8	6	1
By Class					
Average +	252	24	21	14	8
Average	1026	19	18	15	6
Average—	3205	9	10	6	4
Very poor	518	4	3	3	1
Total	5001	12	12	8	4

*Approved Coal Merchants Scheme.

†Transport Users Consultative Committee.

Table 3 Knowledge of Consultative Organisations (Unprompted)

By Registrar General Areas	Base	Percentages of those questioned who knew of the consultative organisations			
		Electricity C.C.	Gas C.C.	Solid Fuel A.C.M.S.	Transport U.C.C.
		%	%	%	%
East Anglia	215	17	18	14	14
East Midlands	346	12	12	5	4
Northern	393	16	11	11	6
North West	613	7	6	3	2
Scotland	500	13	13	10	9
South East	1534	11	12	7	4
South West	310	17	16	9	5
Wales	191	8	8	10	1
West Midlands	501	9	10	9	3
Yorkshire and Humber	398	11	12	9	2
Total—All Areas	5001	12	12	8	4

Table 4 Knowledge of Electricity and Gas Consultative Councils by Board Areas (Unprompted)

Percentages of those questioned who knew of the Councils

Electricity Consultative Councils			Gas Consultative Councils		
Board Areas	Base	%	Board Areas	Base	%
Eastern	609	11	Eastern	384	14
East Midlands	394	11	East Midlands	482	12
London	415	11	North Eastern	249	12
Merseyside & N. Wales	295	8	Northern	367	12
Midlands	534	8	North Thames	440	9
North Eastern	333	19	North Western	638	6
North Western	411	8	Scottish	500	13
Scotland (North & South)	500	13	South Eastern	578	10
South Eastern	380	5	Southern	368	20
Southern	448	20	South Western	306	16
South Wales	133	8	Wales	191	8
South Western	170	22	West Midlands	502	10
Yorkshire	378	10			

Table 5 Sources of Information: Electricity Consultative Councils

5a

By Sex, Age and Class	Total	Sex		Age						Class			
		Men	Women	16-24	25-34	35-44	45-64	65+		A1+	A1	A1-	Very poor
All who have heard of Councils	1254	724	530	138	232	300	455	128		113	384	695	61
Through:	%	%	%	%	%	%	%	%		%	%	%	%
Electricity Board Showrooms	18	20	15	15	17	20	18	16		19	19	17	19
Electricity Board employees	9	10	9	5	9	7	11	11		8	8	10	14
Friend/Relative	10	6	16	8	12	9	11	12		12	8	12	10
Read about them	46	49	43	47	46	44	46	51		48	49	45	48
Other	7	5	6	11	7	7	5	3		3	5	5	2
Don't know	10	10	11	14	9	13	9	7		10	11	11	7

5b

By Electricity Board Areas	Total, all Areas													
	<div> <div>Eastern</div> <div>East Midlands</div> <div>London</div> <div>Merseyside & N. Wales</div> <div>Midlands</div> <div>North Eastern</div> <div>North Western</div> <div>Scotland (N. & E.)</div> <div>South Eastern</div> <div>Southern</div> <div>South Wales</div> <div>South Western</div> <div>Yorkshire</div> </div>													
All who have heard of Councils	1254	151	97	115	59	124	101	116	104	85	146	22	61	73
Through:	%	%	%	%	%	%	%	%	%	%	%	%	%	%
Electricity Board Showrooms	18	15	15	34	19	25	7	17	11	29	17	13	6	16
Electricity Board employees	9	8	11	8	3	9	11	3	15	12	13	4	9	8
Friend/Relative	10	17	8	4	8	10	9	11	16	6	6	27	12	13
Read about them	46	44	44	38	51	40	58	50	47	46	48	43	58	41
Other	7	4	11	7	0	6	12	4	6	1	8	9	3	0
Don't know	10	12	11	9	19	10	3	15	5	6	8	4	12	22

Table 6 Sources of Information: Gas Consultative Councils

6a

By Sex, Age and Class	Total	Sex		Age					Class			
		Men	Women	15-24	25-34	35-44	45-64	65+	Av+	Av	Av-	Very poor
All who have heard of Councils	1284	748	536	145	213	302	488	135	111	376	735	61
Through:	%	%	%	%	%	%	%	%	%	%	%	%
Gas Board Showrooms	19	20	16	19	18	18	20	17	12	17	20	21
Gas Board employees	9	10	9	4	9	6	12	13	5	8	10	18
Friend/Relative	11	8	14	12	14	9	10	11	8	12	10	15
Read about them	43	43	44	44	40	45	43	45	53	45	41	34
Other	7	8	7	5	9	9	7	5	13	8	7	5
Don't know	11	11	10	16	19	13	8	9	9	10	12	7

6b

By Gas Board Areas	Total, all Areas	Eastern	East Midlands	North Eastern	Northern	North Thames	North Western	Scottish	South Eastern	Southern	South Western	Wales	West Midlands
All who have heard of Councils	1284	117	128	49	104	111	124	97	176	118	78	37	145
Through:	%	%	%	%	%	%	%	%	%	%	%	%	%
Gas Board Showrooms	19	15	18	19	9	26	21	18	25	18	10	5	22
Gas Board employees	9	7	9	0	4	5	3	17	10	9	20	14	13
Friend/Relative	11	11	12	16	5	12	13	6	10	4	8	27	16
Read about them	43	45	43	33	55	39	44	43	40	49	54	29	37
Other	7	10	6	13	12	11	5	9	6	7	1	14	5
Don't know	11	12	12	19	15	7	14	7	9	13	7	11	7

Table 7 Sources of information: Transport Users Consultative Committees

7a

By Sex, Age and Class	Total	Sex		Age						Class			
		Men	Women	16-24	25-34	35-44	45-54	65+		Av+	Av	Av-	Very poor
All who have heard of Committees	571	374	196	71	94	136	214	55		61	171	318	20
Through:	%	%	%	%	%	%	%	%		%	%	%	%
Railway station	8	10	5	5	8	9	10	4		5	8	9	10
Notice elsewhere	6	7	6	6	6	3	8	7		5	6	7	4
Railway employee	3	4	2	0	5	4	2	5		0	2	4	13
Friend/Relative	9	8	12	6	9	10	11	4		8	7	10	16
Read about it	48	51	41	41	54	46	46	54		53	52	45	36
Other	9	4	14	14	0	12	9	17		9	8	8	11
Don't know	17	15	20	28	18	16	14	9		20	17	17	10

7b

By Registrar General Areas	By Registrar General Areas											
	Total, all Areas	East Angles	East Midlands	Northern	North West	Scotland	South East	South West	Wales	West Midlands	Yorkshire & Humber	
All who have heard of Committees	570	46	37	57	63	72	179	27	10	51	28	
Through:	%	%	%	%	%	%	%	%	%	%	%	%
Railway station	8	0	2	9	13	12	9	8	0	7	8	
Notice elsewhere	6	4	4	7	8	12	5	8	0	4	6	
Railway employee	3	4	0	2	8	1	5	0	0	0	0	
Friend/Relative	9	7	2	5	9	4	13	3	10	17	8	
Read about it	48	58	58	51	50	45	44	65	45	42	33	
Other	9	10	7	7	2	15	10	8	26	14	21	
Don't know	17	17	27	19	10	11	14	8	19	16	24	

Table 8 Complaints About Electricity in the Past 12 Months

8a

By Sex, Age and Class	Sex		Age						Class			
	Total	Men	Women	16-24	25-34	35-44	45-64	65+	Av+ Av	Av- Very poor		
Base—All	5001	2415	2586	710	883	965	1706	737	251	1026	3205	518
Percentage of those with—	%	%	%	%	%	%	%	%	%	%	%	%
Complaints	19	19	19	20	21	21	20	13	27	23	18	13
No complaints	81	81	81	80	79	79	80	87	73	77	82	87

8b

By Electricity Board Areas	Total, all Areas	Eastern	East Midlands	London	Merseyside & N. Wales	Midlands	North Eastern	North Western	Scotland (N. & S.)	South Eastern	Southern	South Wales	South Western	Yorkshire
Base—All	5001	609	394	415	295	534	333	411	500	380	448	133	170	378
Percentage of those with—	%	%	%	%	%	%	%	%	%	%	%	%	%	%
Complaints	19	22	10	26	17	24	19	17	16	25	19	11	18	15
No complaints	81	78	90	74	83	76	81	83	84	75	81	89	82	85

Table 9 Most Recent Complaints About Electricity

9a

By Sex, Age and Class	Sex		Age						Class			
	Total	Men	Women	16-24	25-34	35-44	45-64	65+	Av +	Av	Av -	Very poor
All those with complaints	957	470	487	144	182	198	339	95	68	236	587	66
Percentage with complaint about—	%	%	%	%	%	%	%	%	%	%	%	%
Supply												
Powercuts	55	55	55	48	52	52	61	60	44	62	54	51
Overcharging	15	16	14	16	15	19	13	17	19	15	15	13
Other	8	7	8	10	7	9	7	5	9	8	7	8
Appliances/Service												
Faulty appliance	9	8	9	9	13	6	8	6	15	10	7	7
Faulty installation	3	4	2	1	6	3	2	2	1	3	3	6
Bad servicing	4	5	2	6	4	5	3	0	2	6	3	2
Service delay	4	4	3	3	5	4	3	3	8	3	4	0
Overcharging	3	4	2	1	4	2	3	3	3	3	2	4
Delivery delay	2	2	1	2	1	0	3	0	3	3	1	0
Other	4	4	3	6	4	3	3	3	3	4	4	5
Percentage who couldn't remember complaint	12	11	12	18	9	10	11	12	9	9	12	19

9b

By Electricity Board Areas	Total, all Areas												
	London	East Midlands	London	Merseyside & N. Wales	Midlands	North Eastern	North Western	Scotland (N. & S.)	South Eastern	South Western	Yorkshire		
All those with complaints	956	134	41	108	50	129	65	66	82	94	36	14	30
Percentage with complaint about—	%	%	%	%	%	%	%	%	%	%	%	%	%
Supply													
Powercuts	55	51	35	59	77	54	38	61	55	57	69	14	43
Overcharging	15	13	29	18	8	16	34	16	19	9	6	7	10
Other	8	8	4	8	0	5	6	5	12	7	10	12	29
Appliances/Service													
Faulty appliance	9	8	11	15	10	5	24	6	1	6	5	7	5
Faulty installation	3	3	2	3	3	3	0	2	6	4	0	12	13
Bad servicing	4	2	2	11	0	4	12	0	1	1	0	7	7
Service delay	4	6	2	6	11	1	7	0	2	0	0	0	20
Overcharging	3	4	4	6	6	1	4	6	1	2	0	0	0
Delivery delay	2	1	0	4	0	0	4	0	0	1	1	7	10
Other	4	4	4	7	2	3	0	3	1	3	4	0	7
Percentage who couldn't remember complaint	12	12	16	5	3	14	9	16	7	18	10	40	0

Table 10 To Whom Complaints About Electricity Were Made

10a

<i>By Sex, Age and Class</i>	<i>Total</i>	<i>Sex</i>		<i>Age</i>					<i>Class</i>			
		<i>Men</i>	<i>Women</i>	<i>16-24</i>	<i>25-34</i>	<i>35-44</i>	<i>45-64</i>	<i>65+</i>	<i>Av+</i>	<i>Av</i>	<i>Av-</i>	<i>Very poor</i>
All those with complaints	957	470	487	144	182	198	339	95	68	236	587	66
Complained to—	%	%	%	%	%	%	%	%	%	%	%	%
Electricity Board	30	31	30	29	39	24	29	32	44	31	28	34
Showroom	2	3	1	1	4	4	2	1	4	5	1	2
Manufacturer	1	1	0	0	0	1	1	0	1	0	0	0
Consultative Council	2	1	4	3	1	4	2	0	4	3	3	0
Other	35	36	35	33	44	33	34	33	53	39	32	36
All who complained	65	64	65	67	56	67	66	67	47	61	68	64
All who did not complain												

10b

<i>By Electricity Board Areas</i>	<i>Total, all Areas</i>	<i>Eastern</i>	<i>East Midlands</i>	<i>London</i>	<i>Merseyside & N. Wales</i>	<i>Midlands</i>	<i>North Eastern</i>	<i>North Western</i>	<i>Scotland (N. & S.)</i>	<i>South Eastern</i>	<i>Southern</i>	<i>South Wales</i>	<i>South Western</i>	<i>Yorkshire</i>
	957	134	41	108	50	129	65	68	82	94	86	14	30	55
Complained to—	%	%	%	%	%	%	%	%	%	%	%	%	%	%
Electricity Board Showroom	30	27	34	35	24	43	44	21	34	20	21	35	47	13
Manufacturer	2	1	0	2	0	1	12	3	0	3	3	0	5	2
Consultative Council	1	0	0	3	0	0	0	1	0	1	0	0	0	0
Other	2	3	3	1	2	4	1	2	5	0	1	6	0	2
All who complained	35	31	37	41	26	48	57	27	39	24	25	41	52	17
All who did not complain	65	69	63	59	74	52	43	73	61	76	75	59	48	83

Table 11 Reasons For Not Complaining: Electricity

11a

By Sex, Age and Class		Sex		Age					Class			
		Total	Men	Women	16-24	25-34	35-44	45-64	65+	Av+	Av	Av- Very poor
All those with complaints		957	470	487	144	182	198	339	95	68	236	587
Reasons for not complaining—		%	%	%	%	%	%	%	%	%	%	%
Fixed by self		1	2	1	2	0	0	2	2	1	1	0
Too much bother		29	30	27	33	24	28	28	33	21	29	29
Did not know where		3	3	4	1	3	4	4	3	0	2	4
Was not important		7	9	6	2	10	9	8	5	5	9	7
Could not remember		18	14	21	20	13	18	18	21	11	12	20
Other		7	6	6	9	6	8	6	3	9	8	7
Percentage who did not complain		65	64	65	67	56	67	66	67	47	61	68

11b

By Electricity Board Areas		Total, all Areas											
		Eastern	East Midlands	London	Merseyside & N. Wales	Midlands	North Eastern	North Western	Scotland (N & S.)	South Eastern	Southern	South Wales	South Western
All those with complaints		134	41	108	90	129	65	68	82	94	86	14	30
Reasons for not complaining—		%	%	%	%	%	%	%	%	%	%	%	%
Fixed by self		1	3	0	3	5	1	0	0	0	0	0	0
Too much bother		29	27	20	21	33	22	21	33	34	37	32	31
Did not know where		3	3	4	4	19	1	0	9	4	0	12	0
Was not important		7	9	11	11	5	4	6	5	5	6	13	0
Could not remember		18	18	21	17	12	19	10	24	14	25	14	47
Other		7	9	7	3	0	5	6	2	4	8	16	1
Percentage who did not complain		65	69	63	59	74	52	43	73	61	76	75	59

Table 12 Most Recent Complaints (classified under eleven headings) about Electricity analysed by where the Complaints were made and by the Reasons for not Complaining

	<i>All with Complaints</i>	<i>Complaints about Supply</i>			<i>Complaints about Appliances and Servicing</i>							
		<i>A</i>	<i>B</i>	<i>C</i>	<i>D</i>	<i>E</i>	<i>F</i>	<i>G</i>	<i>H</i>	<i>I</i>	<i>J</i>	<i>K</i>
Base	903	490	118	65	80	24	33	34	26	16	36	109
Complained to—	%	%	%	%	%	%	%	%	%	%	%	%
Electricity Board Showroom	30	20	44	38	60	80	58	74	54	75	50	6
Manufacturer of appliance	2	2	1	3	23	—	9	3	8	6	6	—
Electricity Consultative Council	1	1	1	2	—	4	6	3	12	6	—	—
Other	2	2	3	6	3	12	—	1	3	—	11	1
Did not complain because—												
Fixed by self/husband/family	1	1	—	2	6	4	—	6	—	—	—	—
Too much bother	28	41	31	21	4	—	18	3	4	6	19	6
Did not know where to complain	3	6	2	2	—	—	—	—	8	—	—	1
Was not important enough	7	11	5	5	1	—	3	3	12	6	3	1
Other	8	7	5	7	1	—	—	1	3	1	11	—
No special reason	18	9	8	14	2	—	6	6	—	—	—	85

Supply

A=Powercuts
B=Overcharging
C=Other supply

Appliances and Servicing

D=Faulty appliance
E=Faulty installation
F=Bad servicing
G=Delay in servicing

H=Overcharging for service
I=Delay in delivery
J=Other complaints
K=Don't know

Table 13 Complaints About Gas in the Past 12 Months

13a

By Sex, Age and Class	Total	Sex		Age						Class			
		Men	Women	16-24	25-34	35-44	45-64	65+		Av+	Av	Av-	Very poor
Base—All with gas in home	3303	1599	1704	458	562	621	1150	512		138	369	2156	378
Percentage of those with—	%	%	%	%	%	%	%	%		%	%	%	%
Complaints	17	18	16	15	18	19	17	16		21	18	17	16
No complaints	83	82	84	85	82	81	83	84		79	82	83	84

13b

By Gas Board Areas	Total, all Areas	Eastern	East Midlands	North Eastern	Northern	North Thames	North Western	Scottish	South Eastern	Southern	South Western	Wales	West Midlands
Base—All with gas in home	3303	245	347	191	186	380	425	276	426	267	131	122	310
Percentage of those with—	%	%	%	%	%	%	%	%	%	%	%	%	%
Complaints	17	19	9	14	20	24	11	15	19	19	12	12	25
No complaints	83	81	91	86	80	76	89	85	81	81	88	88	75

Table 14 Most Recent Complaints About Gas

14a

By Sex, Age and Class	Total	Sex		Age						Class			
		Men	Women	16-24	25-34	35-44	45-64	65+		Av+	Av	Av-	Very poor
All those with complaints	561	288	273	68	102	119	192	79		29	111	362	59
Percentage with complaint about—	%	%	%	%	%	%	%	%	%	%	%	%	%
Supply													
Gas pressure	45	51	39	39	46	40	49	47	38	44	45	50	
Leaking pipes	9	7	11	14	6	11	8	7	8	10	9	8	
Overcharging	11	9	13	9	9	16	9	13	7	8	13	9	
Other	8	7	9	10	4	5	9	15	7	6	8	14	
Appliances/Service													
Faulty appliance	19	16	22	21	21	21	18	14	30	27	17	12	
Faulty installation	5	5	4	6	8	6	3	2	6	4	5	2	
Bad servicing	7	7	7	1	8	7	9	6	12	9	7	4	
Servicing delay	7	6	8	5	11	4	10	3	23	11	6	3	
Overcharging	4	5	2	1	5	5	3	4	0	4	4	2	
Delivery delay	2	2	2	2	5	3	1	0	6	3	2	1	
Other	3	4	3	6	5	4	2	1	4	3	3	2	
Percentage who could not remember complaint	4	3	5	4	2	4	4	5	3	2	4	5	

14b

By Gas Board Areas	Total, all Areas	Eastern	East Midlands	North Eastern	Northern	North Thames	North Western	Scotish	South Eastern	Southern	South Western	Wales	West Midlands
All those with complaints	561	47	32	26	38	90	48	41	79	51	16	15	77
Percentage with complaint about—	%	%	%	%	%	%	%	%	%	%	%	%	%
Supply													
Gas pressure	45	33	28	49	51	45	59	34	33	64	61	29	52
Leaking pipes	9	6	10	5	13	5	11	18	3	7	9	18	13
Overcharging	11	8	23	5	17	7	8	23	7	8	25	23	8
Other	8	10	8	16	12	8	3	8	11	7	5	11	3
Appliances/Service													
Faulty appliance	19	28	21	35	7	23	13	14	27	15	10	6	12
Faulty installation	5	8	9	5	3	6	3	6	5	0	0	0	4
Bad servicing	7	9	11	5	3	7	7	2	9	4	0	0	10
Servicing delay	7	10	6	0	17	11	3	4	9	0	15	7	6
Overcharging	4	4	8	5	7	5	0	2	4	0	0	6	3
Delivery delay	2	4	0	0	0	2	0	3	3	0	5	0	6
Other	3	6	2	5	8	2	3	0	4	3	0	0	4
Percentage who could not remember complaint	4	6	3	0	0	2	3	3	10	3	0	5	3

Table 15 To Whom Complaints About Gas Were Made

15a

By Sex, Age and Class	Total	Sex		Age					Class			
		Men	Women	15-24	25-34	35-44	45-54	65+	Av+	Av	Av-	Very poor
All those with complaints	561	288	273	68	102	119	192	79	29	111	362	59
Complained to—	%	%	%	%	%	%	%	%	%	%	%	%
Gas Board												
Showroom	51	48	54	52	55	56	50	41	61	67	47	37
Manufacturer	2	1	3	1	4	0	3	3	4	2	2	2
Consultative Council	1	2	0	0	2	1	0	1	0	1	1	2
Other	2	3	1	5	1	3	0	1	0	1	2	3
All who complained	56	54	58	58	62	60	53	46	65	71	52	44
All who did not complain	44	46	42	42	38	40	47	54	35	29	48	56

15b

By Gas Board Areas	Total, all Areas	Eastern	East Midlands	North Eastern	Northern	North Thames	North Western	Scottish	South Eastern	Southern	South Western	Wales	West Midlands
All those with complaints	561	47	32	26	38	90	43	41	79	51	16	15	77
Complaints to—	%	%	%	%	%	%	%	%	%	%	%	%	%
Gas Board Showroom	51	55	61	72	49	53	42	62	46	51	47	30	42
Manufacturer	2	9	0	0	3	2	0	0	4	0	0	0	0
Consultative Council	1	0	0	0	0	0	0	3	1	0	0	0	3
Other	2	0	2	0	9	0	3	0	2	2	15	17	4
All who complained	56	64	63	72	61	55	45	65	53	53	62	47	49
All who did not complain	44	36	37	28	39	45	55	35	47	47	38	53	51

Table 16 Reasons for Not Complaining: Gas

16a

<i>By Sex, Age and Class</i>	Total	<i>Sex</i>		<i>Age</i>					<i>Class</i>			
		<i>Men</i>	<i>Women</i>	<i>15-24</i>	<i>25-34</i>	<i>35-44</i>	<i>45-54</i>	<i>65+</i>	<i>Av+</i>	<i>Av</i>	<i>Av-</i>	<i>Very poor</i>
All those with complaints	561	288	273	68	102	119	192	79	29	111	362	59
Reasons for not complaining—	%	%	%	%	%	%	%	%	%	%	%	%
Fixed by self	1	1	1	2	1	0	2	1	0	3	1	1
Too much bother	19	23	15	20	15	16	23	18	18	10	22	19
Did not know where	3	3	3	1	3	2	3	5	0	3	3	4
Was not important	8	8	7	5	8	9	7	11	3	5	9	10
Could not remember	10	8	11	7	8	10	9	13	8	5	10	18
Other	3	3	6	9	2	3	3	6	4	3	3	4
Percentage who did not complain	44	46	43	44	37	40	47	54	33	29	48	56

16b

<i>By Gas Board Areas</i>	Total, all Areas	Eastern	East Midlands	North Eastern	Northern	North Thames	North Western	Scottish	South Eastern	Southern	South Western	Wales	West Midlands
All those with complaints	561	47	32	26	38	90	48	41	79	51	16	15	77
Reason for not complaining	%	%	%	%	%	%	%	%	%	%	%	%	%
Fixed by self	1	0	0	0	0	1	2	3	3	0	0	6	0
Too much bother	19	14	18	18	7	15	32	19	26	7	20	9	29
Did not know where	3	2	4	0	3	5	8	0	0	0	0	19	2
Was not important	8	4	9	5	17	8	2	10	4	13	18	5	7
Could not remember	10	8	3	5	9	12	11	3	12	12	0	14	10
Other	3	8	3	0	3	4	0	0	2	15	0	0	3
Percentage who did not complain	44	36	37	28	39	45	55	35	47	47	38	53	51

Table 17

Most Recent Complaints (classified under twelve headings) about Gas analysed by where the Complaints were made and by the Reasons for not Complaining.

	<i>All with complaints</i>	<i>Complaints about Supply</i>			<i>Complaints about Appliances and Servicing</i>								
		<i>A</i>	<i>B</i>	<i>C</i>	<i>D</i>	<i>E</i>	<i>F</i>	<i>G</i>	<i>H</i>	<i>I</i>	<i>J</i>	<i>K</i>	<i>L</i>
Base	556	251	46	61	64	106	26	40	42	21	14	19	35
Complained to—	%	%	%	%	%	%	%	%	%	%	%	%	%
Gas Board Showroom	50	30	80	54	54	84	86	68	76	81	52	79	17
Manufacturer of appliance	2	1	2	—	2	7	4	7	10	—	14	5	—
Gas Consultative Council	1	1	—	—	—	—	4	7	—	—	7	—	—
Other	2	3	2	3	6	—	—	1	3	—	—	11	—
Did not complain because—													
Fixed by self/husband/family	1	—	4	—	—	1	3	—	2	—	—	—	—
Too much bother	20	33	2	20	20	6	—	7	5	14	20	5	20
Did not know where to complain	3	5	—	7	2	—	—	—	—	5	—	—	—
Was not important enough	8	14	2	5	—	1	3	—	—	—	7	—	3
Other	3	5	4	6	2	1	—	3	2	—	—	—	6
No special reason	10	8	4	7	14	—	—	7	2	—	—	—	54

<i>Supply</i>	<i>Appliance and Servicing</i>		
A=Pressure low	E=Faulty appliance	I=Overcharging for servicing	
B=Leaking pipes	F=Faulty installation	J=Delay in delivery	
C=Overcharging	G=Bad servicing	K=Other complaints	
D=Other supply	H=Delay in servicing	L=Don't know	

Table 18 Complaints About Solid Fuel in the Past 12 Months

18a

<i>By Sex, Age and Class</i>	<i>Total</i>	<i>Sex</i>		<i>Age</i>					<i>Class</i>			
		<i>Men</i>	<i>Women</i>	<i>15-24</i>	<i>25-34</i>	<i>35-44</i>	<i>45-64</i>	<i>65+</i>	<i>A+</i>	<i>A+</i>	<i>A++</i>	<i>Very poor</i>
Base—All with solid fuel in home	3748	1842	1906	527	630	718	1301	574	160	752	2626	411
Percentage of users with—	%	%	%	%	%	%	%	%	%	%	%	%
Complaints	23	23	22	16	26	24	23	23	26	22	23	23
No complaints	77	77	78	84	74	76	77	77	74	78	77	77

18b

<i>By Registrar General Areas</i>	<i>Total, all Areas</i>	<i>East Anglia</i>	<i>East Midlands</i>	<i>Northern</i>	<i>North West</i>	<i>Scotland</i>	<i>South East</i>	<i>South West</i>	<i>Wales</i>	<i>West Midlands</i>	<i>Yorkshire & Humbers</i>
Base—All with solid fuel in home	3748	184	288	338	484	342	1025	256	171	356	308
Percentage of users with—	%	%	%	%	%	%	%	%	%	%	%
Complaints	23	24	23	25	19	28	23	19	16	28	18
No complaints	77	76	77	75	81	72	77	81	84	72	82

Table 19 Most Recent Complaints About Solid Fuel

19a

By Sex, Age and Class	Sex		Age						Class			
	Total	Men	Women	15-24	25-34	35-44	45-54	65+	A++	A+	A-	Very poor
All those with complaints	846	425	421	86	164	171	296	131	41	163	549	93
Percentage with complaint about—	%	%	%	%	%	%	%	%	%	%	%	%
Delayed delivery	27	29	25	39	35	28	24	17	29	37	25	22
Wrong type	6	7	5	13	6	6	6	2	17	7	5	4
Wrong quantity	3	4	2	0	4	5	3	2	2	5	3	0
Bad quality	55	56	54	42	44	58	57	66	44	43	57	65
Other	7	6	8	5	8	7	8	6	15	10	6	6
Percentage who could not remember complaint	5	3	6	2	8	3	6	3	7	5	5	3

19b

By Registrar General Areas	Total, all Areas	East Anglia	East Midlands	Northern	North West	Scotland	South East	South West	Wales	West Midlands	Yorkshire & Humbers
All those with complaints	846	44	66	84	94	95	232	48	27	101	56
Percentage with complaint about—	%	%	%	%	%	%	%	%	%	%	%
Delayed delivery	27	13	36	40	16	14	38	8	14	24	37
Wrong type	6	12	10	1	11	4	4	8	3	6	8
Wrong quantity	3	0	7	2	1	7	3	0	3	2	5
Bad quality	55	66	46	53	74	63	47	68	62	50	36
Other	7	8	5	8	3	6	11	0	18	8	3
Percentage who could not remember complaint	5	2	0	3	3	7	4	7	6	7	11

Table 20 To Whom Complaints About Solid Fuel Were Made

20a

By Sex, Age and Class	Total	Sex		Age					Class			
		Men	Women	16-24	25-34	35-44	45-64	65+	Av+	Av	Av-	Very poor
All those with Complaints	846	425	421	86	164	171	296	131	41	163	549	93
Complained to—	%	%	%	%	%	%	%	%	%	%	%	%
Coal merchant	60	61	59	59	64	60	57	64	72	65	58	69
Other	4	3	4	3	3	3	4	5	2	5	3	5
All who complained	64	64	63	62	67	63	61	69	74	70	61	65
All who did not complain	36	36	37	38	33	37	39	31	26	30	39	35

20b

By Registrar General Areas	Total, all Areas	East Anglia	East Midlands	Northern	North West	Scotland	South East	South West	Wales	West Midlands	Yorkshire & Humbers
All those with complaints	846	44	66	84	94	95	232	48	27	101	56
Complained to—	%	%	%	%	%	%	%	%	%	%	%
Coal merchant	60	72	61	58	63	60	54	66	60	61	63
Other	4	2	9	4	5	5	3	2	3	2	2
All who complained	64	74	70	62	68	65	57	68	63	63	67
All who did not complain	36	26	30	38	32	35	43	32	37	37	33

Table 21 Reasons For Not Complaining: Solid Fuel

21a

By Sex, Age and Class	Total	Sex		Age					Class			
		Men	Women	16-24	25-34	35-44	45-64	65+	Av+	Av	Av-	Very poor
All those with complaints	846	425	421	86	164	171	296	131	41	163	549	93
Reasons for not complaining—	%	%	%	%	%	%	%	%	%	%	%	%
Too much bother	16	18	15	20	9	19	18	17	9	14	17	22
Did not know where	2	1	2	3	1	2	1	1	0	0	2	2
Was not important	5	5	5	7	5	3	6	6	5	3	6	3
Could not remember	10	8	12	6	13	10	11	5	12	9	11	6
Other	3	4	3	2	5	3	3	2	0	4	3	2
Percentage who did not complain	36	36	37	38	33	37	39	31	26	30	39	35

21b

By Registrar General Areas	Total, all Areas	East Anglia	East Midlands	Northern	North West	Scotland	South East	South West	Wales	West Midlands	Yorkshire & Humbers
All those with complaints	846	44	66	84	94	95	232	48	27	101	56
Reasons for not complaining—	%	%	%	%	%	%	%	%	%	%	%
Too much bother	16	12	21	19	22	19	13	17	10	17	12
Did not know where	2	0	0	0	1	0	2	2	3	3	3
Was not important	5	0	2	8	1	4	9	2	7	5	4
Could not remember	10	10	6	6	7	11	13	11	6	9	11
Other	3	4	1	5	1	1	6	0	11	3	3
Percentage who did not complain	36	26	30	38	32	35	43	32	37	37	33

Table 22 Complaints About Public Transport in the Past 12 Months

22a

By Sex, Age and Class	Total	Sex		Age					Class			
		Men	Women	15-24	25-34	35-44	45-64	65+	A+	A	A-	Very poor
Base—All users of public transport	3662	1616	2046	554	615	683	1249	561	120	649	2505	388
Percentage of users with—	%	%	%	%	%	%	%	%	%	%	%	%
Complaints	37	38	37	49	38	40	38	31	45	41	37	31
No complaints	63	62	63	50	62	60	62	69	55	59	63	69

22b

By Registrar General Areas	Total, all Areas	East Anglia	East Midlands	Northern	North West	Scotland	South East	South West	Wales	West Midlands	Yorkshire & Humbers
Base—All users of public transport	3662	152	257	302	461	403	1091	221	141	326	309
Percentage of users with—	%	%	%	%	%	%	%	%	%	%	%
Complaints	37	38	36	34	29	24	50	33	32	42	31
No complaints	63	62	64	66	71	76	50	67	68	58	69

Table 23 Most Recent Complaints About Public Transport

23a

By Sex, Age and Class	Total	Sex		Age					Class			
		Men	Women	16-24	25-34	35-44	45-64	65+	Av+	Av	Av-	Very poor
All those with complaints	1368	615	754	220	233	271	468	176	53	264	930	121
Percentage with complaint about—	%	%	%	%	%	%	%	%	%	%	%	%
Route no longer served	7	7	8	6	5	8	8	10	8	7	7	7
Infrequent service	38	33	42	38	37	36	42	35	43	36	38	40
Erratic timetable	37	42	33	35	43	36	38	29	48	42	36	28
Fares too high	39	39	38	45	30	32	41	47	14	34	41	47
Too crowded	8	11	5	13	7	7	7	5	13	9	8	3
Other	18	14	21	14	18	22	18	18	28	22	16	—
Percentage who could not remember complaint	2	1	2	3	2	1	1	3	2	3	1	1

23b

By Registrar General Areas	Total, all Areas	East Anglia	East Midlands	Northern	North West	Scotland	South East	South West	Wales	West Midlands	Yorkshire & Humbers
All those with complaints	1368	57	93	108	132	95	542	72	46	136	95
Percentage with complaint about—	%	%	%	%	%	%	%	%	%	%	%
Route no longer served	7	8	0	7	0	4	13	3	2	7	1
Infrequent service	38	36	25	26	29	41	69	39	24	30	35
Erratic timetable	37	37	42	42	25	39	40	44	11	36	31
Fares too high	39	30	39	41	51	24	36	38	73	37	32
Too crowded	8	3	1	21	6	7	11	9	0	2	0
Other	18	19	21	21	15	17	20	7	10	19	14
Percentage who could not remember complaint	2	5	1	4	2	2	1	0	0	2	3

Table 24 To Whom Complaints About Public Transport Were Made

24a

By Sex, Age and Class	Total	Sex		Age					Class			
		Men	Women	16-24	25-34	35-44	45-54	65+	Av+	Av	Av-	Very poor
All those with complaints	1368	615	754	220	233	271	468	176	53	264	930	121
Complained to—	%	%	%	%	%	%	%	%	%	%	%	%
Local Bus office	8	10	6	3	9	7	9	8	4	11	7	6
Bus Company's Central Office	4	6	3	4	3	3	5	4	3	8	3	5
Local station	4	5	4	4	4	6	4	5	7	6	4	3
British Railways Head Office	1	1	1	1	1	1	1	0	3	2	1	0
Consultative Committee	0	0	0	0	1	0	1	0	0	0	1	0
Other	6	6	6	4	5	4	8	7	2	5	5	7
All who complained	23	28	20	16	23	21	28	24	19	32	21	21
All who did not complain	77	72	80	84	77	79	72	76	81	68	79	79

24b

By Registrar General Areas	Total, all Areas	East Anglia	East Midlands	Northern	North West	Scotland	South East	South West	Wales	West Midlands	Yorkshire & Humbers
All those with complaints	1368	57	93	103	132	95	542	72	46	136	95
Complained—	%	%	%	%	%	%	%	%	%	%	%
Local Bus office	8	12	9	10	5	14	4	17	4	8	8
Bus Company's Central Office	4	7	4	9	4	2	2	13	0	4	1
Local station	4	11	0	6	3	4	5	3	2	5	4
British Railways Head Office	1	3	0	1	1	2	1	2	0	1	0
Consultative Committee	0	0	0	0	0	2	0	0	0	1	3
Others	6	0	4	4	8	3	11	0	5	1	2
All who complained	23	33	17	30	21	27	23	35	11	20	18
All who did not complain	77	67	83	70	79	73	77	65	89	80	82

Table 25 Reasons For Not Complaining: Public Transport

25a

By Sex, Age and Class	Total	Sex		Age					Class			
		Men	Women	16-24	25-34	35-44	45-64	65+	A+	A	A-	Very poor
All those with complaints	1368	615	754	220	233	271	468	176	53	264	930	121
Reasons for not complaining—	%	%	%	%	%	%	%	%	%	%	%	%
Too much bother	53	50	55	56	51	54	52	52	58	46	54	51
Did not know where	5	3	7	7	5	3	6	6	1	3	5	12
Was not important	7	7	8	8	9	7	6	9	7	7	7	9
Could not remember	6	7	6	7	4	9	5	7	9	5	7	5
Other	6	5	4	8	8	6	3	2	6	7	6	2
Percentage who did not complain	77	72	80	84	77	79	72	76	81	68	79	79

25b

By Registrar General Areas	Total, all Areas	East Anglia	East Midlands	Northern	North West	Scotland	South East	South West	Wales	West Midlands	Yorkshire & Humber
All those with complaints	1368	57	93	103	132	95	542	72	46	136	95
Reasons for not complaining—	%	%	%	%	%	%	%	%	%	%	%
Too much bother	53	46	59	54	58	52	53	43	52	45	57
Did not know where	5	5	7	2	6	1	6	0	23	4	5
Was not important	7	4	8	5	8	7	6	17	2	13	8
Could not remember	6	5	4	5	5	7	6	5	8	8	5
Other	6	7	5	4	2	6	6	0	4	19	7
Percentage who did not complain	77	67	83	70	79	73	77	65	89	80	82

Table 26 Summary of Some Main Findings of the (First) Survey

	<i>Electricity</i>	<i>Gas</i>	<i>Coal</i>	<i>Transport</i>
Total number of those questioned	5001	5001	5001	5001
Percentage with knowledge (unprompted) of consultative machinery	12%	12%	8%	4%
Number of users of the services	5001	3303	3748	3662
Percentage of users with complaint	19%	17%	23%	37%
Percentage of those with complaints who did complain	35%	56%	64%	23%
Percentage of those with complaints who invoked consultative machinery	1%*	1%*	—	—

*Some of these, however, had confused the board with the consultative council.

Table 27 Profile of the (Second) Survey Sample of Users of Consultative Organisations

<i>Sample Total</i>	<i>68</i>	<i>Sample Total</i>	<i>68</i>
Age		Occupation of Head of Household	
Under 25	3	Professional	12
25-34	14	Shop; personal service	8
35-44	21	Office; students, etc.	13
45-54	12	Manual	29
55-64	10	Not stated	6
65 and over	8	Telephone in house	
Class		Telephone	18
Upper and middle	13	No telephone	44
Lower middle and working	45	Not stated	6
Size of Household			
One	4		
Two	19		
Three	17		
Four	14		
Five or more	8		
Not stated	6		

Table 28 Causes of Complaints By Those Who Had Used Consultative Organisations

<i>Consultative Organisation</i>	<i>All</i>	<i>Gas C.C.</i>	<i>Electricity C.C.</i>	<i>Solid Fuel A.C.M.S.</i>	<i>D.C.C.C.*</i>
Sample—All users	69	34	20	10	5
Supply					
Overcharging	10	2	7	1	—
Powercuts; voltage reductions; low gas pressure	4	2	2	—	—
Leaking gas pipes	3	3	—	—	—
Other supply complaints	2	—	1	1	—
Appliances/Service					
Faulty installation	14	9	4	1	—
Faulty appliance	13	7	6	—	—
Delay in servicing	7	4	3	—	—
Bad servicing	3	—	3	—	—
Delivery delay	3	—	1	1	1
Terms of payment	2	1	1	—	—
Other appliances/service complaints	2	—	2	—	—
Method of salesmanship	1	—	1	—	—
Solid Fuel Complaints					
Poor quality	2	—	—	—	2
Wrong type delivered	2	—	—	1	1
Wrong quality delivered	1	—	—	1	—
Other solid fuel complaint	1	—	—	—	1
Total	70	28	31	6	5
Actual complaints	53	26	18	5	4
Requests for information only	16	8	2	5	1

Table 29 How Users First Heard of Consultative Organisations

<i>Consultative Organisations</i>	<i>All</i>	<i>Gas C.C.</i>	<i>Electricity C.C.</i>	<i>Solid Fuel A.C.M.S.</i>	<i>D.C.C.C.</i>
Sample—All using	69	34	20	10	5
Saw notice in showroom	19	14	3	1	1
Told by friend/relative	17	9	6	2	—
Told by employee in showroom/coal merchant	11	4	6	1	—
Read about it in newspaper	4	1	1	2	—
Informed in writing by showroom/coal merchant	2	1	—	—	1
Read about it on bill	2	—	2	—	—
Saw notice in post office/town hall	1	1	—	—	—
Other	9	1	2	3	3
Don't know/no answer	4	3	—	1	—

*Domestic Coal Consumers' Council.

Table 30 First Action Taken By Complainants

<i>Consultative Organisation</i>	<i>All</i>	<i>Gas C.C.</i>	<i>Electricity C.C.</i>	<i>Solid Fuel A.C.M.S. D.C.C.C.</i>	
Sample—All complaining	53	25	18	5	4
First got in touch with—					
Electricity/Gas Board Showroom	30	16	14	—	—
Electricity/Gas Consultative Council	11	7	4	—	—
Approved Coal Merchants Scheme	4	—	—	4	—
Domestic Coal Consumers' Council	3	—	—	—	3
Coal merchant	1	—	—	—	1
Shop/other retailer	1	1	—	—	—
Other	3	2	—	1	—
First got in touch by*—					
Calling in person	26	16	6	2	2
Telephone	23	8	12	3	—
Letter	9	4	3	—	2
Other	2	1	1	—	—

*Two courses of action taken by 7 persons.

Table 31 Time Lapse Before First Making Complaint

<i>Consultative Organisation</i>	<i>All</i>	<i>Gas C.C.</i>	<i>Electricity C.C.</i>	<i>Solid Fuel A.C.M.S. D.C.C.C.</i>	
Sample—All complaining	53	26	18	5	4
Less than 1 week	29	15	13	1	—
1-4 weeks	11	4	2	3	2
Over 4 weeks	11	6	3	1	1
Don't know/no answer	2	1	—	—	1

Table 32 Time Lapse Between First Making Complaint and Contacting Consultative Organisation

<i>Consultative Organisation</i>	<i>All</i>	<i>Gas C.C.</i>	<i>Electricity C.C.</i>	<i>Solid Fuel A.C.M.S. D.C.C.C.</i>	
Sample of those who complained but who did not contact consultative organisation first	35	19	14	1	1
Less than 1 week	9	3	5	1	—
1-4 weeks	10	5	4	—	1
Over 4 weeks	10	7	3	—	—
Don't know/no answer	6	4	2	—	—

Table 33 Time Taken by Consultative Organisation to Give Final Answer to Complaint

<i>Consultative Organisation</i>	<i>All</i>	<i>Gas C.C.</i>	<i>Electricity C.C.</i>	<i>Solid Fuel A.C.M.S. D.C.C.C.</i>	
Sample—All complaining	53	26	18	5	4
Less than 1 week	22	14	6	2	—
1–4 weeks	15	7	5	1	2
Over 4 weeks and less than 8 weeks	6	2	1	2	1
Over 8 weeks	3	3	2	—	—
Don't know	4	—	3	—	1
Still being dealt with	1	—	1	—	—

Table 34 Satisfaction With Consultative Organisations

<i>Consultative Organisation</i>	<i>All</i>	<i>Gas C.C.</i>	<i>Electricity C.C.</i>	<i>Solid Fuel A.C.M.S. D.C.C.C.</i>	
Sample—All complaining	53	26	18	5	4
Satisfied	41	22	12	4	3
Not satisfied	12	4	6	1	1

Table 35 Future Use of Consultative Organisations

<i>Consultative Organisation</i>	<i>All</i>	<i>Gas C.C.</i>	<i>Electricity C.C.</i>	<i>Solid Fuel A.C.M.S. D.C.C.C.</i>	
Sample—All using	69	34	20	10	5
Yes, would use again	62	32	17	9	4
No, would not use again	7	2	3	1	1

Table 36 The Value of Consultative Organisations

Consultative Organisation	All	Gas C.C.	Electricity C.C.	Solid Fuel A.C.M.S. D.C.C.C.	
Sample—All using	69	34	20	10	5
Very good, could not be better	34	19	10	4	1
Fairly good, but could be improved in some ways	21	9	6	3	3
Not very satisfactory	5	1	2	1	1
Not good at all	3	2	1	—	—
Don't know; no answer	6	3	1	2	—

Table 37 Good and Bad Points of Consultative Organisations

Consultative Organisation	All	Gas C.C.	Electricity C.C.	Solid Fuel A.C.M.S. D.C.C.C.	
Sample—All using	69	34	20	10	5
Good points					
Helpful	58	28	16	9	5
Efficient	41	19	12	7	3
Knowledgeable	40	19	13	6	2
Bad points					
Not very helpful	6	1	4	1	—
Inefficient	6	2	3	1	—
Uninformed	4	1	1	2	—

Table 38 Need for Improvements in Consultative Machinery

Consultative Organisation	All	Gas C.C.	Electricity C.C.	Solid Fuel A.C.M.S. D.C.C.C.	
Sample—All using	69	34	20	10	5
No improvement needed	55	27	17	8	3
Some improvement needed	14	7	3	2	2